



EPA Spill Unit

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A Subsidiary of  
Star-Kist Foods, Inc.



# Star-Kist Samoa, Inc.

## SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

AMENDED  
MARCH, 2003

Star-Kist Samoa, Inc.  
P.O. Box 368  
Pago Pago AS. 96799  
Phone #: (684) 644-4231



Star-Kist Samoa, Inc.

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## **SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN**

**FOR**

**STAR-KIST SAMOA, INC.  
P.O BOX 368  
ATU'U PAGO-PAGO  
AMERICAN SAMOA, 96799**

**Original Date of Plan: November 3, 1979**

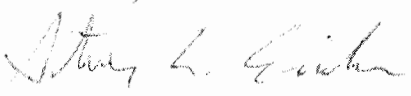
**Date of Last Plan Amendment/P.E Certification: March, 2003**

### **Designated Person Accountable for Spill Prevention**

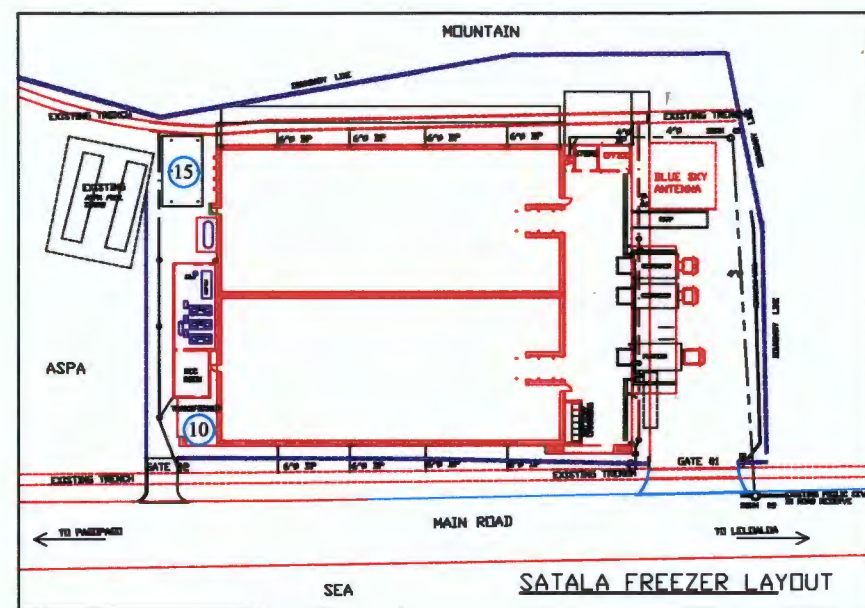
**Phil Thirkell  
General Manager**

### **CERTIFICATION**

I hereby certify that I have examined the facility and being familiar with the provision of 40 CFR part §112, attest that this SPCC Plan has been prepared in accordance with good engineering practices

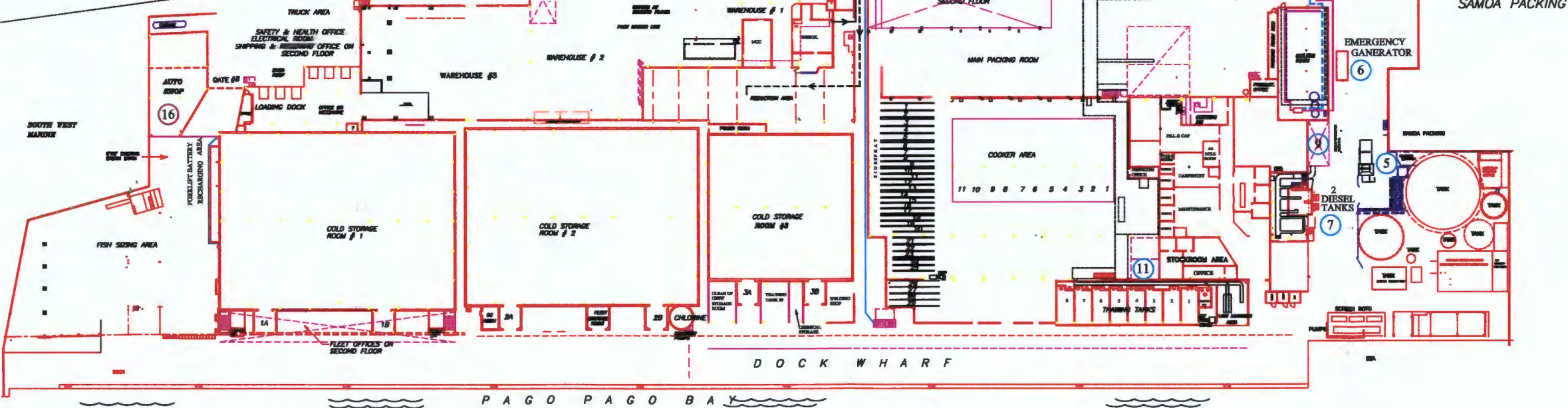
**Engineer : Steven L. Erickson**  
**Title : Director, Environmental Services**  
**Signature : **  
**Registration Number: 19853**  
**State : Washington**  
**Date : April 7, 2003**





**REID WAREHOUSE**

POWER TRANSFORMER AND CONDENSERS ON ROOF LEVEL



# **LEGEND**

- BOILER DIESEL FUEL SUPPLY
- FISH OIL
- ROAD TANKER TO DIESEL STORAGE TANK
- ROAD TANKER TO VEG. OIL STORAGE TANK
- BOILER DIESEL FUEL RETURN LINE
- VEG. OIL TO PLANT
- FISHMEAL BURNER DIESEL FUEL SUPPLY
- SPRING WATER
- RECLAIM WATER TO STORMDRAIN
- FROM RECLAIM WATER TANK TO RETORT WATER FILTER TANK
- FROM RETORT WATER FILTER TANK TO RECLAIM WATER TANK

## **LEGEND**

- #1 - FUEL TANK
- #2 - FUEL TANK
- #3 - VEGETABLE TANK
- #4 - VEGETABLE TANK
- #5 - OIL & WATER SEPARATOR
- #6 - EMERGENCY GENERATOR UNIT
- #7 - EMERGENCY GENERATOR FUEL
- #8 - EMERGENCY FUEL TANK
- #9 - TRANSFORMER
- #10 - TRANSFORMER [SATALA AREA]
- #11 - HYDRAULIC RESERVIOR
- #12 - HYDRAULIC RESERVIOR
- #13 - POLE MOUNT TRANSFORMER [SUBSTATION]
- #14 - POLE MOUNT TRANSFORMER [SUBSTATION]
- #15 - TRANSFORMER RESERVE [SATALA AREA]
- #16 - MOTOR OIL DRUMS

DESIGN: S. TAYLOR	STARKIST SAMOA	
CHECKED:	SPCC PLAN	
DATE: 12/98		
APPROVED:		
DATE:	SHEET	DRAWING #





**SPILL PREVENTION CONTROL AND COUNTERMEASURE  
COMPLIANCE INSPECTION PLAN  
REVIEW PAGE**

In accordance with 40 CFR §112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, Star-Kist Samoa, Inc. will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the Facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

**REVIEW DATES**

1. April, 1995\*
2. February, 1997
3. December, 2000\*
4. March, 2003\*
5. March, 2008
6. March, 2013
7. March, 2018

**SIGNATURE**

Barry Mills  
Barry Mills  
Phil Thirkell  
Phil Thirkell

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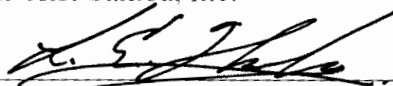
\* SPCC Plan amended and certified by a Registered Professional Engineer per 40 CFR §112.5(b).



Star-Kist Samoa, Inc.

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**The individual appointed to be responsible and in charge of SPCC Plan.**

Name : Lance Ihaka  
Title : Manager, Maintenance and Engineering  
Star-Kist Samoa, Inc.  
Signature:   
Date : 4.7.03

**MANAGEMENT APPROVAL**

Star-Kist Samoa, Inc. is committed to conduct its business in an efficient manner, and maintains its operations in an environmentally safe manner by complying with applicable environmental regulations for Spill Prevention Control and Countermeasures through regular review, updating, and implementation of this plan.

Name : Phil Thirkell  
Title : General Manager  
Star-Kist Samoa, Inc.  
Signature:   
Date : 4/7/03.



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**ENVIRONMENTAL PROTECTION AGENCY  
40 CFR PART §112  
OIL POLLUTION PREVENTION AND RESPONSE**

**Subpart A – Applicability, Definitions and General  
Requirements for All Facilities and All types of Oils**

**SECTION §112.1 GENERAL APPLICABILITY**

The Environmental Protection Agency (EPA) amended the Oil Pollution Prevention regulation promulgated under the authority of Clean Water Act. This rule includes requirements for Spill Prevention, Control and Countermeasure (SPCC) Plan. The final Rule is effective August 16, 2002 includes new subparts outlining the requirements for various classes of oil; revises the applicability of the regulations and amends the requirements.

The SPCC plan rule applies to owners or operators of facilities that drill, produce, gather, store, process, refine, transfer, distribute, use, or consume oil and oil products, and might reasonably be expected to discharge oil in quantities that may be harmful into the navigable waters of the United States or adjoining shorelines, or waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act of 1974.

Facility which meets both criteria specified in Section §112.1 (d)(2)(I) and (ii) is subject to the rule therefore must prepare a SPCC plan:

The first criterion, Section §112.1(d)(2)(I) is: the capacity must be 42,000 gallons or more oil for the completely buried storage. The under ground tank excludes the capacity of the tank itself and the capacity of the tank that area “permanently closed” as defined in Section §112.2. The threshold applies to storage capacity contained in the operating equipment as well as to storage capacity contained in the tanks.



The second criterion, section §112.1(d)(2)(ii) is: the above ground storage capacity of the facility is 1,320 gallons or more of oil. Containers of oil with the capacity of 55 gallons or greater are counted. The above ground storage capacity of the containers exclude the capacity of the containers that are “permanently closed” as defined in section 112.2. the threshold applies to storage capacity in operating equipment as well as to storage capacity in containers.

Star-Kist Samoa, Inc. amended the SPCC plan in compliance with 40 CFR, part §112 to comply with the revised regulations for oil storage capacity which is greater than the capacity specified in section §112.1(d)(2)(ii).



## **SECTION 112.2 DEFINITIONS**

**Alteration** means any work on a tank or related equipment involving cutting, burning, welding, or heating operations that changes the physical dimensions or configuration of a tank.

**Bulk Storage Tank** means a container used to store oil. These containers are used for the purposes including, but not limited to, the storage of oil storage oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

**Completely Buried Tank** means any container completely below grade and covered with earth, sand, gravel, asphalt, or other material. Containers in vaults, bunkered tanks, or partially buried tanks are considered above ground storage containers for purpose of this part.

**Contiguous Zone** is the area that extends nine miles seaward from the outer limit of the territorial sea. A presidential proclamation of December 17, 1988 (No. 5928, 54 FR 777, January 9, 1989) extended the territorial seas of the United States to 12 nautical miles from the baseline of the United States as determined in accordance with the international law.

**Contract or other approved** means

A written contractual agreement with an oil spill removal organization that identifies and ensures the availability of necessary personnel and equipment within appropriate response times; and/ or

A written certification by the owner or operator that the necessary personnel and equipment resources, owned or operated by the facility owner or operator, are available to respond to a discharge within appropriate response times; and/or

Active membership in a local regional oil spill removal organization that has identified and ensures adequate access through such membership to necessary personnel and equipment to respond to a discharge within appropriate response times in the specified geographic area; and/or

Any other specific arrangement approved by the Regional Administrator upon request of the owner or operator.



**Discharge** includes, but is not limited to any “spilling, emptying, or dumping,” of oil. A discharge as describe in section 112.1(b) need not reach the level of an imminent danger to affected lands, pumping, pouring, emitting, emptying, or dumping of any amount of oil no matter where it occurs. It may not be a reportable discharge under 40 CFR part §110 if oil never escape secondary containment at the facility and is promptly cleaned up. If the discharge escape secondary containment, it may become a discharge as describe in section §112.1(b), and if that happens, the discharge must then be reported to the National Response Center.

Foreseeable or chronic point source discharges that are permitted under section 402 of the CWA in which the discharger is engaged or due to the operation of the treatment facilities required by the NPDES permit, are to be regulated under the NPDES program. Discharge that in compliance with the provision of the permit; or resulted from a circumstance identified and reviewed and made a part of the public record with respect to a permit issued or modified under section 402 is not be a discharge under section §112.2 definition.

**Facility** means any mobile or fixed, onshore building, structure, installation, equipment, pipe or pipeline (other than a vessel or public vessel) used in oil well drilling operation, oil refining, oil storage, oil gathering, oil processing, oil transfer, oil distribution, and waste treatment, or in which oil is used. The boundaries of a facility depend on several site-specific factors, including, but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and the types of activity at the site.

**Navigational Water** include all waters with a past, present, or possible future use in interstate or foreign commerce, including all waters subject to the ebb and flow of the tide. Navigable water also includes interstate or foreign commerce. Regulation specified that certain waste treatment systems are not navigable waters.

**Oil** means oil of any kind or in any from, including but not limited to: fats, oil, or greases of animal, fish, or marine mammal origin: vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

**Onshore facility** means any facility of any kind located in, on, or under any land within the United States, other than submerged lands.

**Owner or operator** means any person owning or operating an onshore facility or an offshore facility, and in the case of any abandoned offshore facility, the person who owned or operated or maintained the facility immediately prior to such abandonment.



**Permanently closed** means any container or facility for which all connecting lines or piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

**Person** includes an individual, firm, corporation, association, or partnership.

**Production facility** means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non- transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil, or associated storage or measurement, and located in a single geographical oil or gas field operated by a single operator.

**Regional Administrator** means the Regional Administrator of the Environmental Protection Agency, in and for the Region in which the facility is located.

**Repair** means any work necessary to maintain or restore a container or related equipment to a condition suitable for safe operation. The definition also includes reconstruction means the work necessary to reassemble a container that has been dismantled and relocated a new site. Amended definition reflects the ordinary, day-to-day maintenance that does not weaken the integrity of the container.

**Storage capacity** of a container means the shell capacity of the container.

**Vegetable oil** means a non-petroleum oil or fat of vegetable origin, including but not limited to oils and fats derived from plants seeds, nuts, fruits, and kernels.

**Worst case discharge** for an onshore non-transportation-related facility means the largest foreseeable discharge in adverse weather condition.



## **SECTION §112.3 REQUIREMENT TO PREPARE AND IMPLEMENT A SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN.**

The owner or operator of an onshore or offshore facility subject to this section must prepare a Spill Prevention, Control and Countermeasure Plan (hereafter "SPCC Plan" or "Plan"), in writing, and in accordance with section §112.7, and any other applicable section of this part.

1. If your onshore or offshore facility was in operation on or before August 16, 2002, you must maintain your Plan, but must amend it, if necessary to ensure compliance with this part, on or before April 17, 2003, and must implement the amended Plan as soon as possible, but not later than October 18, 2003. If your onshore or offshore facility becomes operational after August 16, 2002, through August 18, 2003, and could reasonably be expected to have a discharge as described in section §112.1(b), you must prepare a Plan on or before August 18, 2003, and fully implement it as soon as possible, but not later than August 18, 2003.
2. If you are the owner or operator of an onshore or offshore facility that becomes operational after August 18, 2003, and could reasonably be expected to have a discharge as describe in section 112.1(b), you must prepare and implement a Plan before you begin operations.
3. If you are the owner or operator of an onshore or offshore mobile facility, such as an onshore drilling or workover rig, barge mounted offshore drilling or workover rig, or portable facility, you must prepare, implement, and maintain a facility plan as required by this section. This provision does not require that you prepare a new plan each time you move the facility to a new site. The plan may be a general plan. When you move the mobile or portable facility, you must locate and install it using the discharge prevention practices outlined in the plan for the facility. You may not operate a mobile or portable facility subject to this part unless you have implemented the plan. The plan is applicable only while the facility is in a fixed (non-transportation) operating mode.

Star-Kist Samoa Inc. was operating prior to August 16, 2002 and therefore must amend its existing SPCC Plan by April 17, 2003. The Revised SPCC Plan will be submitted to USEPA Region 9 and ASEPA. The revised SPCC Plan will be implemented before October 18, 2003.





## **SECTION §112.4 AMENDMENT OF SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN BY REGIONAL ADMINISTRATOR**

Whenever a SPCC facility has:

- a. Discharges more than 1,000 U.S gallons of oil in single discharge as describe in section §112.1(b), or
- b. Discharged more than 42 U.S gallons of oil in each of 2 discharges as describe in section §112.1(b), occurring within any 12-month period.

Upon completion of the emergency response to a discharge/release, the Critical Operation Team leader will file an incident Investigation –SPCC- Incident Summary and distribute the report to the Emergency Response Organization for review at the critique meeting. This document is found in Appendix H.

For releases of oil product to land or navigable waters any person in charge of shore facility or vessel must:

- a. As soon as he/she has knowledge of any discharge of oil from the vessel or facility in which the amount may violate applicable water or land environment standards; or cause a sludge or emulsion to be deposited beneath the surface of the water on land or adjoining surfaces, shall notify the National Response Center and Local United States Coast Guard Office. Refer to Appendix F for a List of Telephone Numbers.
- b. In addition to notifying the National Response Center and Local United Coast Guard, if the discharge is greater than 1,000 gallons in a single events, or oil is discharged in two spills within (12) twelve months (greater than 42 gallons each), the owner or operator must submit a written report to the EPA Regional Administrator within sixty (60) days. This report must contain the following information:
  - Name of facility
  - Name of owner or operator of facility
  - Location of facility
  - Description of the facility: including maps flow diagrams, and topographic maps
  - The Cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred



- The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacement.
- Additional preventive measures taken or contemplated to minimize the possibility of re-occurrence.
- Such other information as the Regional Administrator may reasonably require.

After a review of the investigation by the On-Scene-Commander the final report will be filed within thirty days after the spill, at the time, the cause of the incident will have been determined and remedial action planned. If for any reason this report cannot be filed within the period mentioned above, a "preliminary report" must be written will be superseded by the final report not later than sixty (60) days after the spill incident. The Star-Kist Samoa, Inc. On-Scene-Commander prior to filing, must review all reports.



## **SECTION §112.5 AMENDMENT OF SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN BY OWNERS OR OPERATORS**

SPCC Plan must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. Examples of changes that may require amendment of the Plan include, but are not limited to:

- Commissioning or decommissioning containers.
- Replacement, reconstruction, or movement of containers.
- Reconstruction, replacement, or installation of piping systems.
- Construction or demolition that might alter secondary containment structures.
- Changes of product or service.
- Revision of standard operation or maintenance procedure at a facility
- An amendment made under this section must be prepared within six months and implemented as soon as possible, but not later than six months following preparation of the amendment.

SPCC Plan must be review at least every 5 years from the date a facility becomes subject to the SPCC rule; or for an existing facility, 5 years from the date the last review was required under this regulation. The facility must amend the SPCC Plan within 6 months of the review to include more effective prevention and control technology if:

1. Such technology will significantly reduce the likelihood of a discharge as describe in section §112.1(b) from the facility; and
2. If such technology has been field-proven at the time of the review. Implementation of amendments is required within 6 months following amendment. The owner operator must document completion of the review and evaluation, and must sign a statement as to whether he will amend the Plan, either at the beginning or end of the Plan or in a log or appendix to the plan. The following will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result."

A Professional Engineer must certify amendments. PE certification is not required for non-technical amendment, like changes to phone numbers, names, etc.



The original Spill Prevention Control and Countermeasure Plan (SPCC) was prepared on November 03, 1979. Due to various modifications adjacent to the plant, which interfered with truck unloading containment berms, this SPCC Plan was updated and reviewed by Norman Wei, a Registered Professional Engineer, on April 30, 1995. This plan was again reviewed and updated on December, 2000 by John Brown, a Registered Professional Engineer to reflect the management of change. The current SPCC Plan was amended on March 2003 to align the plan in the revised regulation.

The additional information that will reflect in the amended SPCC Plan were the following:

1. Information pertaining to Transformers and Hydraulic oil.
2. The new contractor Solar Inc. under contract for any spill events concerning the company(s) facility.
3. The reporting discharged information, which reflects in section §112.4(a) of the revised regulation.
4. The new requirements for periodic integrity testing of containers, and leak testing of valves and piping. Hydrostatic Testing, Ultrasonic Testing, and Brittle Fracture testing will be implemented in this facility.

The revised SPCC Plan will be implemented before October 18, 2003. A Licensed Professional Engineer must review and certify a Plan for it to be effective to satisfy the requirements of this part. By means of this certification the Professional Engineer attests:

- That he is familiar with the requirements.
- That he or his agent has visited and examined the facility.
- That the plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part.
- Those procedures for required inspections and testing have been established. That the Plan is adequate for the facility.

See page (i) for the “Professional Engineer’s Certification”.

See page (ii) for scheduled review dates

A complete copy of the SPCC Plan will be located in Engineering Office and EPA Specialist Office and is available to the Regional Administrator or other agency for on-site review during normal working hours.

- On-Scene-Commander (Phil Thirkell)
- In-Charge of SPCC Plan (Lance Ihaka)
- Critical Operation Team Leader (Joe Carney)
- EPA Specialist (Ma. Theresa Pastorfide)



## **SECTION §112.7 GENERAL REQUIREMENTS FOR SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN**

SPCC Plan must be prepared in accordance with good engineering practices and has the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan.

The Star-Kist Samoa, Inc. SPCC Plan is written following the sequence and requirements specified in this regulation.

Refer to page (iii) for management approval.

### **Section §112.7(a)(2) General Requirements for Spill Prevention, Control and Countermeasure Plans**

The SPCC Plan of the facility may deviate from the security (§112.7 (g)), facility tank car and tank truck loading/unloading (§112.7 (h)(2) and (3)), and brittle fracture evaluation (§112.7 (I)) requirements of this section and requirements in subpart B and C of this part, except the secondary containment requirements in paragraphs, where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure. Where your plan does not conform to applicable requirements in paragraphs (g), (h)(2) and (3), and (i) of this section, or the requirements of subpart B and C of this regulation, except secondary requirements, you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures describe in your plan do not provide equivalent environmental protection, he may require that you amend your plan following the procedure in section 112.4(d) and (e).

Star-Kist Samoa Inc. SPCC Plan does not deviate from the security (§112.7 (g)), facility tank car and tank truck loading and unloading (§112.7(h)(2) and (3)), and the Brittle fracture evaluation (§112.7(i)) requirements of this section. The Star-Kist Samoa Inc. facility set up is applicable in Subpart A, B and C of this regulation.



### **Section §112.7 (a)(3) Physical Layout of Facility**

Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each container. The facility diagram must completely buried tanks that area otherwise exempted from the requirements of this Regulation under §112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes.

The physical layout of Star-Kist Samoa, Inc. is describe in this section, the facility diagram which is the cover page of the plan marks the location and the content of each container that stores oil product.

**Appendix B** “Facility Drainage of Stormwater and Wastewater” contains the diagrams of facilities stormwater outfalls/drainage which illustrate the facilities structures, overall storm water drainage pattern, process water drain, stormwater outfalls. Another diagram is Waste Water Treatment and Disposal Process, which illustrate waste water treatment process. **Appendix G** contains diagram of Dike Storage Area, Oil Separator, Diesel and Vegetable Unloading Area and Calculation of the Dikes area, volume and capacity.

#### **LOCATION**

Pago Pago Harbor, American Samoa

United States Possession

Longitude: W 170 degrees 41’15”

Latitude: S 14 degrees 16’ 28”

#### **CURRENT OPERATIONS**

Star-Kist Samoa, Inc. operates a Fish Canning Plant in Atu-u, Pago Pago American Samoa. Canned tuna such as albacore , yellow fin, big eye and skipjack in water with broth or oil are manufactured in this facility. All of the manufacturing operations are conducted inside the building. However, some related activities such as unloading of the vessels and waste water treatment occur outside. The facility operates 24 hours per day, 5 days a week. Fish Cleaners are working (2) two shifts. The facility has over 2,800 regular team members working in various departments.

#### **STORMWATER**

The Storm Water permitting program in the Territory of American Samoa is administered by the U.S Environmental Protection Agency (EPA) under the National Pollutant Discharge Elimination System (NPDES) authorized under the Federal Clean Water Act and associated regulations.





Star-Kist Samoa, Inc. has in place a storm water pollution prevention plan to prevent process water or other possible pollutant associated with the food processing in the facility from coming in contact with storm water. All the storm water runoff will be discharged in Pago Pago Harbor via 8 outfalls located on the harbor side of the facility.

### **WASTE WATER**

All process wastewater (which includes clean-up water, thaw tank water, dock run-off water) except pre-cooker water and fishmeal process liquor goes through the facility's wastewater treatment system and finally to the wastewater outfall line which runs 8,000 feet into the outer harbor.

The wastewater treatment system includes a system of piping trenches and sumps that collect the process water, a rotary screen to separate large solids, a surge tank, a dissolved air flotation system (DAF). The resultant DAF sludge is skimmed and pumped to the high strength tank for storage disposal via ocean dumping.

All the possible discharge that goes to the sump pit will be skimmed for oil, waste oil will be properly disposed of by processing it to the oil/water separator located in wastewater treatment area and will be burned in the boiler's.

### **HAZARDOUS MATERIALS**

All hazardous materials including chemicals, vegetable oil and diesel oil are properly stored and contained with a secondary containment. The facility does not manufacture, process or otherwise use chemicals in an amount to trigger TRI requirement.

### **UNIVERSAL WASTE**

Star-Kist Samoa, Inc. facility a conditionally exempt small quantity generator of hazardous waste and generates occasional batteries and fluorescent tubes, the facility is exempt small quantity generator of universal waste. The facility is allowed to dispose of its universal waste in licensed municipal solid waste landfill.



## **Section §112.7(a)(3)(II) Discharge Prevention Measures**

The following are discharge prevention measures including procedures for routine handling of products (loading, unloading and facility transfer)

### **On-Shore Facility Transfer Operations**

The loading and unloading procedures for Diesel and Vegetable Oil tank trucks meet the minimum requirements and regulations established by the federal Department of Transportation, 49 CFR section §177.834, and include the following:

EPA Specialist or designate must be present with tank truck driver at all times during unloading operation to ensure:

- Tank truck has no leak
- Tank discharge pipe is inside the containment
- Hoses are in good condition
- Quick connection couplings are seated firmly
- Pump is in good working condition
- Control valve is open
- Check the level of the tank prior to loading
- All safety regulations are observed at all times. Caution tape must be used and wheel's must be chocked prior to unloading/loading.

At the end of the unloading operation, EPA Specialist or designate will ensure that:

- Control valve is closed
- Pump is turned to the "off" position
- Hoses are purged, capped and tank has no leaks
- House keeping to ensure that all residue or spill's are properly taken care of
- Final check of all connecting lines, pumps and any potential problem

### **ABOVE GROUND TANKS AND DIKE INTEGRITY**

Periodic integrity testing and inspection includes visual inspection of tanks, tank valves, interconnecting piping, tank supports and dike walls for tightness. The inspection is completed on a monthly basis by EPA Specialist and is documented using Form D-3, "Visual Report for Tank Farm Containment Area" in Appendix D.



The exterior portion of the tank(s) is inspected yearly for sign of corrosion. This is documented on Form D-6, " Visual Inspection Report for Tank Farm Containment Area" in Appendix D.

Inventory control and visual inspection(s) by EPA Specialist or designate are made prior to each load delivery to prevent overflowing of product. The EPA Specialist or designate is responsible for checking the level of the appropriate tank in the tank farm.

Proper instructions will be given to all the oil handlers (Boiler team members and Sanitation team members in proper procedure of hooking up transfer hoses, starting of pump(s) and reversing this procedure when contents of truck have been successfully deposited in the tank. This is documented on Form D-8 titled "Visual Inspection Report for Oil Delivery Monitoring" located in Appendix D. Continuous monitoring of the transfer operation by EPA Specialist or designate is Mandatory to ensure minimal risk of spill incident.

All potential problems related to tanks, piping, hoses or drums are immediately reported to Utility Department Head for appropriate action. Work order will be distributed to the designated department in-charge and must be filed for future reference.

Drums and totes are always transported on a pallet and checked for any leaks. Proper filling of the drums must be ensured to minimize the event of spill or leak.

Training of all oil-handling operators is a requirement and following the checklist that is provided in the procedure of loading/unloading of oil. Refer to Appendix D-8 title "Visual Inspection Report/Checklist for Oil Delivery Monitoring"



### **Section §112.7(a)(3)(II) Discharge or Drainage Controls**

Following is a description of drainage control such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge.

The facility wastewater treatment system includes a system of piping trenches and sumps that collect the process water. Trenches along the production area, dock area, and wastewater area will collect all the process water and will be drain directly to the sump along alley #2. The sump pit has two pumps to accommodate the entire facilities process water (which includes clean-up water, thaw tank water, and dock run-off water). Any possible discharge that would accumulate in the sump will be skimmed, transported to the oil/water separator and will be burnt in the boiler's.

Storm water from the site discharges into the harbor via 8 outfalls located on the harbor side of the facility. All other storm run-off goes into the wastewater treatment system. Roof drains go to subsurface storm water system via down spout penetration. The dock has an 8-inch berm that prevents any storm water or process water from reaching the harbor.

There is a secondary containment located in the tank farm that will accommodate the possible discharge of 110% of the largest tank. Rain water collected in this containment after visual inspection will be pumped to the wastewater treatment system.

The unloading area has a secondary containment with 125% capacity of the largest tank truck unloaded. Rainwater collected in this containment will be pumped to the wastewater treatment system after visual inspection. Refer to Appendix B for diagram of the Star-Kist WasteWater Treatment and Disposal Process and the diagram of the Overall Storm Water Drain Layout. Refer to Appendix G for Dike Storage Area and Soya Bean and Fuel oil Unloading Area



### **Section §112.7(a)(3)(iv) Countermeasure For Discharge Discovery**

Following are the countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor).

Weekly visual inspections of all oil containers and the surrounding areas of the diesel and vegetable tanks, emergency fuel tanks, transformers, hydraulic reservoir, emergency generator, drums and totes, oil/water separator, and areas using motor oil such as auto shop is conducted to determine if a discharged has occur.

Refer to Section §112.7 (a)(4) of this plan, which explain the details of response in the event of spill.



Star-Kist Samoa, Inc.

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**Section §112.7(a)(3)(v) Methods of Disposal of Recovered Materials.**

Recovered oil and oil-contaminated materials are disposed of or recycled in accordance with applicable legal requirements.

Star-Kist Samoa facility is considered a small quantity handler of universal waste that is exempt from the universal waste rule. The facility's small quantity of universal waste is disposed in a licensed municipal solid waste landfill. Oil filters drained of free-flowing oil and solid waste are transported by Star-Kist Samoa, Inc. operators and trucks to the licensed municipal solid waste landfill. The facility collects, stores and burns its used oil for energy recovery. Used oil that is recycled or burned for energy recovery is stored in sealed containers and inspected periodically to ensure there are no spills or leaks, bung cap's will always in place to ensure that no spill in handling to the oil/separator area. All the drum's are labeled "used oil/empty drums" to ensure good management practice.





Star-Kist Samoa, Inc.

### **Section §112.7(a)(3)(vi) Contact List and Phone Numbers**

The contact list and phone numbers for the facility response coordinator, National Response Center, clean up contractor with whom we have an agreement for response, and all-appropriate Federal, State, and Local agencies who must be contacted in case of a discharge.

#### **FACILITY OWNER AND OPERATOR**

##### **A. Facility Owner, Operator, Address and Telephone No:**

Star-Kist Samoa, Inc.  
P.O Box 368  
Atu'u Pago Pago  
American Samoa, 97699  
(684) 644-4231

#### **FACILITY CONTACT(S):**

	NAME		TELEPHONE NO.
2.1	Phil Thirkell /Business/General Manager	Business	(684) 644-1835 Ext. 311/327
	On Scene Commander	Cellular	(684) 258-4211
		Home	(684) 644-1324

#### **Designated Person(s) in Charge (DPIC)**

	NAME		TELEPHONE NO.
2.2	Lance Ihaka/Manager Engineering	Business	(684) 644-4249 Ext. 362
	Emergency Response Coordinator	Cellular	(684) 258-3234
		Home	(684) 644-1238
2.3	Sonny Thompson/Safety & Health Mngr.	Business	(684) 644-1343 Ext. 425
	Safety and Health Team Leader	Cellular	(684) 258-2384
		Home	(684) 644-1343
2.4	Joe Carney/Dept. Head, Utility	Business	(684) 622-2860 Ext. 354
	Critical Operation Team Leader	Cellular	(684) 258 6964
		Home	(684) 644-2332
2.6	Ma. Theresa Pastorfide/EPA Specialist	Business	(684) 644-1026
	Responder	Home	(684) 699-5779

Refer to Appendix F of this plan for the Government Agency Notification List and numbers.



### **Section §112.7 (a)(4) Discharge Reporting Requirement**

Information and procedures in a Facility's SPCC Plan to enable the person reporting to relate information on the following:

- Exact address or location and phone numbers of the facility
- Date and time of the discharged
- Type of material discharged
- Estimates of the total quantity discharged
- Estimates of the quantity discharged
- The source of the discharge
- Any damages or injuries caused by the discharge
- Actions being used to stop, remove, and mitigate the effect of the discharge
- Whether an evacuation may be needed
- Names of individuals and/or organizations that have also been contacted

Refer to Appendix H, title Incident Investigation-SPCC Plan Incident Summary (Form 11R-1A to Form 11R-Log).



### **Section §122.7(a)(5) Emergency Procedure**

A response plan under section §112.20 is not required. Portion's of the SPCC Plan describe procedure's we will use when a discharge occurs, and discussed in a way that makes them usable in an emergency.

#### **Responsibilities of the facility Owner to mitigate an average most probable discharge.**

The Designated Person(s) in Charge (DPIC) will delegate the DPIC duties to those team members performing the task(s) truck drivers, transfer operators.

It is the responsibility of the EPA Specialist to ensure that all equipment used in the transfer operation meets the requirements of the regulation. He/She needs to ensure that sufficient quantity of oil absorbent pads or booms is on hand to clean up discharged product up to 10 gallons.

#### **ACTION(S) TO BE TAKEN IN THE EVENT OF:**

Discharge from the transfer equipment or hose(s) tank overfills piping leak, rupture or failure.

- a. EPA Specialist and/or designate will immediately initiate emergency shutdown of transfer operation.
- b. EPA Specialist and/or designate will turn off pump and close the discharge valve and close the facility-receiving valve.
- c. For minor spills. The EPA Specialist will deploy oil absorbent pads to contain the spill. The quantity of absorbent pads will be sufficient to clean up the average most probable discharge of 10 gallons.
- d. For other emergencies, the EPA Specialist will contact the internal individuals and external organizations outlined in Appendix F of the plan to initiate a complete organizational response.



## **SPILL INTO DIKED AREAS AND/OR THE LOADING OR UNLOADING AREAS**

The person discovering the spill will immediately call Star-Kist Security, who in turn will contact the On-Scene-Commander. The On-Scene-Commander will notify the appropriate agencies based on the information available. Refer to the Notification List in the Appendix F for details.

- US COAST GUARD
- AMERICAN SAMOA ENVIRONMENTAL PROTECTION AGENCY
- TEMCO
- NATIONAL RESPONSE CENTER
- AMERICAN SAMOA FIRE DEPARTMENT
- AMERICAN SAMOA PUBLIC SAFETY OFFICE (POLICE)

**Solar Inc. is under contract for any spill event concerning the company(s) facility.**

<b>Contact Name</b>	<b>:</b>	<b>Ben Solaita</b>
<b>Address</b>	<b>:</b>	<b>P.O Box 5380 Pago Pago, American Samoa 96799</b>
<b>Telephone No.</b>	<b>:</b>	<b>Office: (684) 699-8706 Mobile: (684) 733-1317</b>
<b>Secondary Contact</b>	<b>:</b>	<b>Chris Solaita</b>
<b>Address</b>	<b>:</b>	<b>P.O Box 5380 Pago Pago, American Samoa 96799</b>
<b>Telephone No.</b>	<b>:</b>	<b>Office: (684) 699-8706 Mobile: (684) 733-6287</b>



**Information Required:**

- Location
- Material
- Estimated Volume of Release
- Possible Source of Release
- Date of Release
- Time of Release

**A record of the call for each spill event will be maintained and kept at the security office, below is an example of the Form.**

**RECORD OF SPILL**

<b>DATE:</b>	
<b>TIME:</b>	
<b>PRODUCT:</b>	
<b>EST.VOLUME:</b>	
<b>CAUSE:</b>	

<b>Corrective action Taken:</b>
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<b>Plans for Preventing Re-Occurrence</b>
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## **FIRE OR EXPLOSION RELATING TO UNLOADING OPERATIONS**

The EPA Specialist and/or designate will cease transfer operations immediately and report the fire to the security guards at the nearest security gate. If the fire is in the incipient stage the appropriate fire extinguisher will be used to extinguish the fire. Fires that area other than incipient must be responded to by the fire department. General evacuation is handled carefully due to the close proximity of the truck unloading area to the planned evacuation route. It is paramount that accurate information be given to management in advance of sounding the general alarm.

In the event of an explosion the EPA Specialist and/or designate will immediately cease all unloading operations and report the explosion to the security guard at the nearest security gate. General evacuation procedures are to be initiated carefully due to the planned evacuation route being in close proximity to the unloading area. Accurate information is essential early on the allow management to decide on possible deviations from the norm. If there should be a resulting fire refers to above proceeding section.

## **GOVERNMENT AGENCY NOTIFICATION (Notification Procedure)**

Based on the information received the On-Scene-Commander will notify the appropriate government agencies.

The government agencies to be notified are as follows:

- TEMCO
- FIRE DEPARTMENT
- POLICE DEPARTMENT
- ASEPA
- NATIONAL RESPONSE CENTER

**Specific notification agencies and there contact numbers are found in Appendix F.**





## **Section §112.7(b) Potential Spill Prediction, Volumes, Rates and Control- Fault Analysis**

Where experience indicates a reasonable for equipment failure (such as loading or unloading equipment, Tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in the Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.

### **PREDICTION OF POTENTIAL SPILLAGE DUE TO EQUIPMENT FAILURE**

- Average Most probable Discharge from the Facility (10 gallons)
- Maximum Most Probable Discharge from the Facility (3,750 gallons)
- Worst Discharge from the Facility (46,100 gallons)

Average most probable discharge scenario assumes a gasket leak or pipe fitting drip discovered during a routine check.

Maximum most probable discharge scenario assumes a tank overflow as a result of operator error. Allowing 15 minutes of undetected pumping at 250 gallons per minute rate, the result would be 3,750 gallons.

Worst case discharge scenario assumes a complete rupture of an entire tank and all contents being discharged.

- I. Vegetable Oil 42,300 gallons
- II. Diesel Oil 42,300 gallons

Therefore the worst case scenario, in the unlikely event of the delivery pump running undetected for 15 minutes and tank plus delivery-piping rupture, would be 46,100 gallons.



## IDENTIFICATION OF TYPES OF FAILURES

### **Minor Failure:**

Average most probable discharge scenario assumes a gasket leak pipe fitting drip discovered during a routine check.

### **Major Failure:**

Maximum most probable discharge scenario assumes a tank overflow as a result of operator error. Allowing 15 minutes of undetected pumping at 250 gallons per minute rate, the result would be 3,750 gallons.

Worst Case discharge scenario assumes delivering product to the tank farm and the following takes place:

- a. Tank and piping system rupture
- b. Pumping continues undetected for 15 minutes

Therefore the worst case scenario, in the unlikely event of a tank and delivery piping system discharging their content at the same time, would be 46, 100 US gallons.

## DIRECTION OF FLOW

- a. In the event of a major failure, the discharged product will be contained by the dike surrounding the storage tanks or with the berm and catch basin at the truck unloading area.
- b. Used petroleum oil from the plant will be stored in 55 gallons drums with bungs capped for re-use as a fuel within the plant's boilers. A separate storage area located adjacent to the waste water treatment plant is utilized where the oil filtration equipment is located.

## RATE OF FLOW

- a. The rate of flow would be determined by the type(s) of failure and the volume of storage facility affected. A severe failure scenario would be a massive collapse of an entire storage tank(s).



## 5.5 TOTAL QUANTITY OF FLOW

In the event that a failure is not secured in time, the maximum total quantities would be as follows:

- a. Tank farm storage area: (2) 42,300 gallons vegetable oil and (2) 42,300 gallons fuel oil tanks.
- b. Plant truck unloading area 4, 000 gallons vegetable oil tank or 4,000 gallons of fuel oil tank.
- c. Self-contained emergency generator, 1,300 gallons diesel fuel.
- d. Emergency generator, (2) tanks 100 gallons each diesel fuel.
- e. Maximum volume of a used oil spill would be 55 gallons, resulting from a puncture or overturning. This quantity would flow into a secondary containment (catch basin) in the wastewater treatment area.
- f. Emergency fuel tank contains 120 gallons diesel fuel.
- g. Transformer along compressor contains 760 gallons Non-PCB transformer oil.
- h. Transformer in Satala Freezer, 350 gallons Non-PCB transformer oil.
- i. Pole Mount transformer (2 substations) logistic and fleet, (6) transformers 90 gallons each of Non-PCB transformer oil.
- j. Hydraulic reservoirs contain 500 gallons of hydraulic oil in retort, and 150 gallons of hydraulic oil in fish room.



## Section §112.7© Secondary Containment

Appropriate containment and/or diversionary structures or equipment are used to prevent discharges. The entire containment system, including walls and floor is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before clean up occurs. At a minimum, one of the following prevention systems or its equivalent is used:

- \* Dikes, berms, or retaining walls sufficiently impervious to contain oil
- \* Curbing
- \* Culverting, Gutters, or other drainage system
- \* Weirs, boom, or other barriers
- \* Spill diversion ponds
- \* Sorbent materials

### Secondary Containment

- a. **Tank Farm Storage Area-** The (2) 42,300 gallons vegetable oil tanks and (2) fuel tanks area contained within a common dike area, capable of containing 52,200 gallons. This represents slightly over 110% containment capabilities of the largest tank's contents. Refer to Appendix G for Diagram, title "Dike Storage Area"
- b. **Truck Unloading Area-** a concrete berm 6' x 10' x 12' which drains into a 5,000 gallons sump with an oil separation baffle. This will hold 125% of the largest truck tank transferring at the berm. Refer to Appendix G for Diagram, title "Soya Bean and Fuel Oil Unloading Area."
- c. **Self-contained Emergency Generator** uses a double-walled fuel tank, which provides sufficient containment capacity.
- d. **Emergency Generator**, two 100 gallons tanks for diesel fuel tank, no secondary containment, however any spill would be captured by trench drains and flow to the waste water treatment plant.
- e. **Emergency Fuel Tank** has a metal containment that will contain 110% of the tank's capacity. Any discharge that is collected in the containment will be drained and processed in the oil/water separator.
- f. **Transformer** along alley #1, no secondary containment, however in the event of leak/spill the discharge oil will flow directly to waste water treatment.



- g. **Hydraulic reservoir**, no secondary containment. In the event of spill trench drainage will capture the discharged oil and flow directly to the wastewater treatment.
- h. Providing the volume of used oil that could be spilled in a single event is approximately 55 gallons, the entire volume will be contained within the plant drainage collection system and contained in the waste water treatment area, where it can be effectively cleaned and disposed. Bung caps will be kept in place so as to minimize the probability of a spill.
- i. All tanks and reservoirs will have a weekly inspection for exterior deterioration on the wall and other possibility of spill. Refer to Appendix D Form D-9 "Visual Inspection for Oil Container Exterior Area".
- j. Refer to Appendix C for equipment list and records provided by Solar Inc. service under contract to respond concerning oil spill management.
- k. EPA Specialist should check the stock room for the inventory of absorbent booms, absorbent sheets and other supplies needed for cleanup in the event of any discharge in the facility.



### **Section §112.7(d) Alternate Secondary Containment Methods**

If the installation of any of the listed secondary containment structures is not practicable, you must clearly explain in the Plan why such measures are not practicable and you must conduct periodic integrity testing of bulk storage containers and periodic integrity leak testing of valves and piping; and the following must be provided in the plan:

1. An oil spill contingency plan following the provisions of part of this chapter.
2. A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Refer to Appendix (1-4) title, Mechanical Integrity program for Oil Storage System Pipe/Valve/Fitting Inspection Records (Hydrostatic Test of Vegetable/Fuel Oil Pipes and Hoses). This test is schedule by April, 2003

Refer to Appendix (1-5) title, Mechanical Integrity Program for Oil Storage System Tanks Inspection Records (Ultrasonic Test of Vegetable/Fuel Oil Tanks). This test is schedule by October, 2003.



## **Section §112.7(a) Inspection, test and Records**

Conduct inspections and test required by this part in accordance with written procedures that you or the certifying engineer develops for the facility. These written procedures and a record of the inspections and test, signed by the appropriate supervisor or inspector, are kept with the SPCC Plan for a period of three years.

### **INSPECTION AND RECORDS**

#### **INSPECTION**

- a. The EPA Specialist on a daily basis will perform visual inspection of tanks and associated equipment. Documentation of these inspection is made on Form D-1 title "Visual Inspection Report for Tank Farm Containment Area" located in Appendix D.
- b. During Non-Production periods the security personnel will visually inspect the storage areas at the facilities and report any oil spill or possible problem that will be detected immediately to the Critical Operation Team Leader.
- c. The EPA Specialist, who has primary responsibility for the storage area, will conduct a monthly inspection of the area and maintain records of such inspection for period of three (3) years. The Utilities Supervisor will be present during the monthly inspection and sign off the inspection sheet. Documentation of this inspection is made using Form D-3 title "Monthly Visual Inspection Report for Tank Farm Containment Area" included in Appendix D.

#### **RECORDS**

- a. Inspection forms will be filled out and kept at the facility for a period of three (3) years. Refer to Appendix D for inspection example.



- b. Records of inspection will be forwarded to the Department Head, Utilities for review. The EPA Specialist will keep the Inspection Records.
- c. During an inspection, the EPA Specialist or any inspector upon noticing a leak or rupture will report to the security guard at the nearest security gate who will notify the On-Scene-Commander. The On-Scene-Commander will notify the appropriate agencies based on the information available.

**Refer to the Notification List in Appendix F for more information details.**

#### **INSPECTION FORM(S)**

- Daily Visual Inspection report for Dike Tank Farm Containment Area ( Form D-1 )
- Water Removal Report for Dike Tank Farm Containment Area ( Form D-2 )
- Monthly Visual Inspection Report for Dike Tank Farm Containment Area ( Form D-3 )
- Oil Removal Report for Dike Tank Farm Containment Area ( Form D-4 )
- Oil Separator Inspection Report ( Form D-5 )
- Yearly Visual Inspection Report for Dike Tank Farm Containment Area ( Form D-6 )
- Record of Inspection by Outside Agencies ( Form D-7 )
- Visual Inspection Report/Checklist for Oil Delivery Monitoring ( Form D-8 )
- Weekly Visual Inspection for Oil Container Exterior Area (Form D-9 )





### **Mechanical Integrity Program for Oil Storage System**

- Mechanical Integrity Program for Oil Storage System Information (Appendix I-1)
- Mechanical Integrity Program for Oil Storage System Purpose and Inspection Program Components (Appendix I-2)
- Mechanical Integrity Program for Oil Storage System Dike Area (Appendix I-3)
- Mechanical Integrity Program for Oil Storage System Pipe/Valve/Fitting Inspection Records (Appendix I-4)
- Mechanical Integrity Program for Oil Storage System Tanks Inspection Records (Appendix I-5)
- Mechanical Integrity Program for Oil Storage System Hose Inspection Record (Appendix I-6)
- Mechanical Integrity Program for Oil Storage System Pump Units Inspection Record (Appendix I-7)



### **Section §112.7(f) Personnel Training and Discharge Procedure**

At a minimum, oil-handling personnel must be trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.

Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.

Schedule and conduct discharge prevention briefings for oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges or failures, malfunctioning components, and any recently developed precautionary measures.

The Critical Operation Team Leader is the designated person accountable for oil spill prevention and reports to Emergency Response Coordinator and Plant Manager.

Boiler operators who are responsible in fuel oil; Sanitation team members for vegetable oil loading /unloading and all the special project and general maintenance team members are instructed in the operation, maintenance, and filling of those storage tanks. The Annual Spill Prevention, Containment and Countermeasure Training was conducted on May 09, 2002. The training session presented information on the facility's SPCC Plan, including potential sources of spills, potential areas of spill impacts, and methods to minimize the potential for spills and the response to spill that do occur. Oil-handling team members were given the proper procedure of loading/unloading of oil, good house keeping, and spill prevention procedure.

Appropriate training is provided to each individual with responsibilities under this plan. All Response Personnel are trained to meet Occupational Safety and Health Administration (OSHA) standards for emergency response operation contained in 29 CFR §1910.120, as well as applicable Federal and Territorial Regulations. Safety and Health Department is responsible in conducting and handling all the necessary document pertaining Hazwoper Training.

Refer to Appendix A for Training Outline.



## Section §112.7(g) Security

Facilities must comply with the following:

1. Fully fence each facility handling, processing, or storing oil, and lock and/or guard entrance gates when the facility is not in production or is unattended.
2. Ensure that the master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status.
3. Lock the starter control on each oil pump in the "off" position and locate it at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status.
4. Securely cap or blank-flange the loading/unloading connections of oil pipelines or facility piping when not in service or when in standby service for an extended time. This security practice also applies to piping that is emptied of liquid content either by draining or by inert gas pressure.
5. Provide facility lighting commensurate with the type and location of the facility that will assist in the :
  - a. Discovery of discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.).
  - b. Prevention of discharges occurring through acts of vandalism.

## FACILITY SECURITY AND LIGHTING

### SECURITY

1. Star-Kist Samoa, Inc. maintains 24-hours security personnel at all the gates encompassing Star-Kist Samoa, Inc. which includes the facility storage areas.
2. A six-foot (6') high metal chain link fence secures the facility storage areas with entry gate(s) along the hillside road. Gates are locked at times during non-production days or nights and when unattended.
3. Master flow and drain valves that are capable of unauthorized discharge of tank(s) contents to surface waters are securely locked in the closed position when in non-operating or non-standby status.



4. The starter controls on all oil pumps are locked in the “off” position when pumps are in the non-operating or non-standby status. The unloading area is fenced in, security (Gate 1) control access.

## **LIGHTING**

Star-Kist Samoa facility lighting is located so as provide the facility storage area with consideration to:

1. Discovery of spill occurring during hours of darkness by Star-Kist personnel, the general public or emergency agency personnel i.e. police/fire etc.
2. Prevention of vandalism.



### **Section §112.7(h) facility Tank Car and Tank Truck Loading/Unloading Rack**

1. Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.
2. Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.
3. Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

#### **Star-Kist Bulk Deliveries Areas:**

\* **Bulk Vegetable Oil and Fuel Oil to the tank farm:** Oil-handling team members secure the loading area using the barriers and surround the area with Caution Tape for warning signs. Oil-handling team members were instructed to be at the loading area for the entire loading time to ensure the loading procedure will be followed and to check that no mechanical or technical problem might occur. In the event of spill, discharge will be contained in the containment which hold's 125% of the largest tank truck capacity, pumped to the sump pit, skim the discharge oil, disposed through the oil/separator to be burnt in the plant boiler. After loading house keeping is carried out.

\* **Bulk Motor oil in drums:** Upon hauling the motor oil, forklifts were instructed to check the drums for any sign of leak, puncture, or hole that will cause a spill. Proper placement of drums on pallet and bung caps must be in place to ensure safe hauling. In the event of spill, a trench along auto shop will catch the oil, drained directly into the sump. Absorbent materials used to control, contain, and clean up the spill. Proper disposal of the absorbent materials is done.



**\* Used oil in drums:** Used oil from auto shop, fill and cap, general maintenance, compressor, production area and fish meal are stored in labeled drums. In the event of spill all department have access to the absorbent materials to be used. Proper disposal of the absorbent materials is mandated to all users.

**Note:**

All empty metal drums are labeled before disposal. Checked for residue and bung caps are in place.

All Plastic drums are checked/cleaned for residue, cut into half before disposal.



### **Section §112.7(l) Brittle Fracture Evaluation**

Evaluation of field-constructed aboveground containers is required if they undergo repair, alteration, reconstruction or change in service that might affect the risk of a discharge or failure due to fracture or other catastrophe. This evaluation is also required when there has been a discharge or failure due to brittle fracture or other catastrophe and appropriate action must be taken if necessary.

Star-Kist Samoa, Inc. has (4) four ABOVE GROUND CONTAINERS located in the Tank Farm. All four tanks are field constructed aboveground containers. The facility will conduct the brittle fracture evaluation if any of the tanks will undergo repair, alteration, reconstruction or changes in service to comply with the regulation. If the evaluation shows that the tank's condition will affect the risk of discharge due to brittle fracture then the facility will do the necessary action to maintain or restore a container to a condition suitable for safe operation. All work related to brittle fracture evaluation will be properly documented for future reference.



Star-Kist Samoa, Inc.

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### **Section §112.7(j) State Rules**

Include in the Plan a complete discussion of conformance with applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulation and guidelines.

There are currently no American Samoa rules, regulations, or guidelines pertaining to Spill Prevention and Containment Procedures more stringent than those contained in 40 CFR section §112.7





## **Subpart B- Requirements for Petroleum Oils and Non-Petroleum Oils, Except Animal Fats and Oils and Grease**

### **Section §112.8 Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Facilities (Excluding Production Facilities)**

#### **Section §112.8(b)(1-5) Facility Drainage**

1. Drainage from diked storage areas must be restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility system are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually operated and the condition of the accumulation must be inspected before starting to ensure that no oil will be discharge.
2. For drainage of diked areas, valves must be manual, open-and-closed design. Flapper-type drain valves may not be used to drain diked areas. If the drainage will go directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater.
3. Facility drainage system from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or tanks truck discharges may occur outside the loading area) must be designed to flow into ponds, lagoons or catchment basins designed to retain oil or return it to the facility. Catchment basins must not be located in areas subject to periodic flooding.
4. If the facility drainage is not engineered as in paragraph (b)(3), the final discharge of all ditches inside the facility must be equipped with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.
5. Where drainage waters are treated in more that one treatment unit and such treatment is continuous, and pump transfer is needed, two lift pumps must be provided and at least one of the pumps must be permanently installed. Facility drainage system must be engineered to prevent a discharge in case of equipment failure or human error.



## **DRAINAGE FROM DIKED STORAGE AREAS**

The containment dike that surround the tank has a 4" line which utilize a pump for discharging water, collected in the dike. See sketch on Form G-1 labeled "Dike Storage Area" in Appendix G for a relative location of pump and piping system.

During inspection of containment area the EPA Specialist will check for water and signs of floatable debris, odor and/or oil sheen. Following area guidelines for dealing with the different scenarios that might be encountered during those inspections.

- (a). No water or debris in the containment area requires no action other than documentation on Form D-1 "Visual Inspection Report for Tank Farm Containment Area" in Appendix D.
- (b). Water level of 3" or more above pump sump requires close inspection for floatable, odors or oil sheen. If none of these are present then pumping of water to the wastewater treatment plant will be necessary. This will be accomplished by starting the containment pump and pumping the water down to the level of the pump sump or pump suction and documenting on Form D-2 "Water Removal Report from Dike Tank Farm Containment" in Appendix D
- ©. Water level of 3" or more above pump sump and presence of debris but no oil sheen or odor requires skimming off and depositing in containers by the EPA Specialist. He/She has been trained on proper disposal methods for the debris. Remaining water can then be pumped to the WWTP as above. Documentation of debris removal is made on Form D-2 "Water Removal Report from Dike Tank Farm Containment" in Appendix D.
- (d). Water level of 3" or more above pump sump and visible signs of oil requires immediately notification to the Manager, Engineering and/or Department Head, Utility. One or both of them will proceed to the containment area to observe the situation and either stays until this condition is remedied or steps to be taken in correcting the condition and final disposal of oil. Oil must be skimmed off and placed in containers for disposal in the Oil Water Separator. Once all signs of oil are removed the remaining water can be pumped to the WWTP as per above for treatment. The incident will be documented on Form D-4 "Oil Removal Report from Dike Tank Farm Containment" including in Appendix D.



(e).All oil will be transported to the Oil Water Separator and subsequent burning in plant boilers. Water that is separated from the oil mixture will be sent to the WWTP for further treatment. All water whether from the DIKED area or from the Oil Water Separator will be sent to the Wastewater Treatment Plant.

#### **DRAINAGE OF RAINWATER FROM DIKED AREA**

The removal of rainwater consist of pumping the accumulated water from the containment area to the waste water treatment plant as the diagram on From D-2 "Water Removal Report from Dike Tank Farm Containment" located in Appendix D.



**Section §112.8©(1-11) Bulk Storage Containers**

- (1) You must not use a Container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.
- (2) All bulk storage container installations must be constructed so that a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation is provided. Diked areas must be sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.
- (3) Drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system is not allowed unless you:
  - (i) Normally keep the bypass valve sealed closed.
  - (ii) Inspect the retained rainwater to ensure that its presence will not cause discharge as described in §112.1(b).
  - (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and
  - (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with § 122.41(j)(2) and 122.41(m)(3) of this chapter.
- (4) Completely buried metallic storage tanks installed on or after January 10, 1974 must be protected from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test completely buried metallic storage tanks.
- (5) You must not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.
- (6) Each aboveground container must be tested for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skidmounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of nondestructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations.



In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

- (7) Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return exhaust lines through a settling tank, skimmer, or other separation or retention system.
- (8) Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices:
  - (i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice.
  - (ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level.
  - (iii) Direct audible or code signal communication between the container gauge and the pumping station.
  - (iv) A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers.
  - (v) You must regularly test liquid level sensing devices to ensure proper operation.
- (9) Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in § 112.1(b).
- (10) Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.
- (11) Position or locate mobile or portable oil storage containers to prevent a discharge as described in § 112.1(b). You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

1. The plant storage area includes four (4) ABOVE GROUND TANKS. The materials of construction and storage conditions are compatible with the oils stored in the tank. Their use and capacities are describe in section §112.7(a)(3)(1) of this plan. The tank list is found in Appendix G of this plan.



2. All bulk storage containers have secondary containment that will accommodate 110% or more of the largest capacity of each tank.
3. Drainage of the uncontaminated rainwater from the dike and containment of the loading/unloading area will be pumped directly into the wastewater treatment plant.
4. Star-Kist Samoa, Inc. does not possess completely buried metallic storage tanks.
5. Star-Kist Samoa, Inc. does not possess partially buried or bunkered storage tanks.
6. Refer to Appendix I title, "Mechanical Integrity Program for Oil Storage System"
7. Star-Kist Samoa, Inc. does not possess internal heating coils.
8. All four tanks have a level indicator with cable attached into a float inside the tank to monitor its liquid level. Boiler operator and sanitation team members must manually check the level indicator to ensure proper operations.
9. Oil Separator is inspected regularly to ensure that equipment and container are within operational specification.
10. All discharge noted in the daily inspection in the entire plant will immediately be cleaned and work order will be forwarded to designated department that will repair the mechanical problem that causes a discharge. Follow up inspection to ensure that the cause of the discharge was corrected.
11. All mobile or portable oil storage containers are properly stored in a location within secondary containment.



**Section §112.8(d)(1-5) Facility Transfer Operations, Pumping and Facility Process**

1. Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.
2. Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.
3. Properly design pipe support to minimize abrasion and corrosion and allow for expansion and contraction.
4. Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.
5. Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.

Refer to Appendix I title, Mechanical Integrity Program for Oil Storage.



Star-Kist Samoa, Inc.

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## **APPENDIX A**





## SPCC PLAN APPENDIX A

### STAR-KIST SAMOA, INC SPCC Plan Training Outline

#### Regulatory Requirement:

#### **40 CFR §112.7(f) Personnel Training and Discharge Prevention Procedure**

Owners or Operators are responsible for properly instructing oil-handling personnel at least once a year on the following Information to assure adequate understanding of the SPCC Plan:

1. The operation and maintenance of equipment to prevent discharge of oil.
2. Facility discharge procedure protocols.
3. Applicable pollution control laws, rules, and regulations.
4. General facility operations.
5. The contents of the facility SPCC Plan.
6. Known discharge or failures, malfunctioning components and any recently developed precautionary measures.

#### TRAINING PROGRAM OUTLINE

AGENDA: (Must be discussed in details)

- Introduction of SPCC
- Regulatory Overview
- Contents of Facility SPCC Plan
- General Facility Operation
- Discharge Procedure Protocol
- Operation and Maintenance of Equipment
- Incident of Discharge, Malfunctioning of Components and Precautionary measures



Training will ensure that participants have an understanding of the SPCC Plan and its elements, and will highlight and describe the following:

- any recent spill events or equipment failures
- malfunctioning components
- recently developed precautionary measures

### **Background:**

Part §112 of 40 CFR outlines the requirements for both the prevention of and the response of oil spills. The prevention aspect of the rules requires preparation and implementation of Spill, Prevention, Control and Countermeasure (SPCC) Plan. The original SPCC requirements originally promulgated on December 11, 1973 (38 FR 34164), under the authority of section §311(j)(1)(C) of the act.

Environmental Protection Agency (EPA) has adopted regulations under 40 Code of Federal Regulations (CFR) §110, which prohibit oil discharges to waters of the United States. Facilities that are regulated with 40 CFR §112 will meet the following criteria:

- a. Facility which stores oil in excess of threshold quantities (either 42,000 gallons below ground or 1,320 gallons aboveground in all containers).
- b. Facilities could reasonably be expected to discharge oil in harmful quantities into the navigable waters of the United States or adjoining shorelines.

The regulations apply regardless of whether storage involves bulk tanks, drums, or other vessels. The scope of the regulation includes all kind of oil, petroleum and non-petroleum oils, as well as products derived from oil, including mineral, animal, and vegetable oils.

### **Requirements/Contents of SPCC Plan:**

- a. The SPCC Plan is intended to detail how a regulated facility and its operation comply with 40 CFR §112. Guidelines for the plan contents are in 40 CFR §112.7 – §112.8.
- b. The SPCC Plan must include an inventory of oil storage vessels, spill history, and an analysis of possible spill scenarios, which may involve the failure of vessels, piping and appurtenances as well as accidents during loading or unloading operations.
- c. The SPCC Plan must describe structures, equipment, and procedures that the facility will use to prevent and contain spills.
- d. The facility must provide secondary or diversionary structures to contain spills from all vessels.
- e. The SPCC Plan must include a facility contingency plan for responding to oil spills.
- f. Spills must be reported to the National Response Center and Appropriate local agencies.
- g. The SPCC Plan must be reviewed and certified by a Registered Professional Engineer and signed by Plant Management.



Star-Kist Samoa, Inc.

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## Documentation

### **Star-Kist Samoa, Inc.**

#### **Spill Prevention, Control and Countermeasures**

#### **Acknowledgment of Training**

I, the undersigned, acknowledge that on \_\_\_\_\_ I attended a training session on Spill Prevention, Control and Countermeasure at Star-Kist Samoa, Inc. in Pago Pago, American Samoa conducted by \_\_\_\_\_.

The training session presented information on the facility's Spill Prevention Control and Countermeasures (SPCC) Plan, including potential sources of discharge; potential areas of spill impact; precautionary measure for discharge; discharge procedure; operation and maintenance equipment; recent spill events; malfunction components; methods to minimize the potential for spills; regulation applicable to SPCC Plan, and facility operation.

During the session I was given adequate time to ask questions about my particular job activities and how I can best conduct them in compliance with the SPCC regulation.

Name (print): \_\_\_\_\_

Name (signature): \_\_\_\_\_

Department: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_

#### Note:

All training program attendees must sign in on the "Employee Attendance Record".  
Documentation/Records pertaining SPCC Plan Training must be filed in the SPCC Plan.



Star-Kist Samoa, Inc.

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## **APPENDIX B**

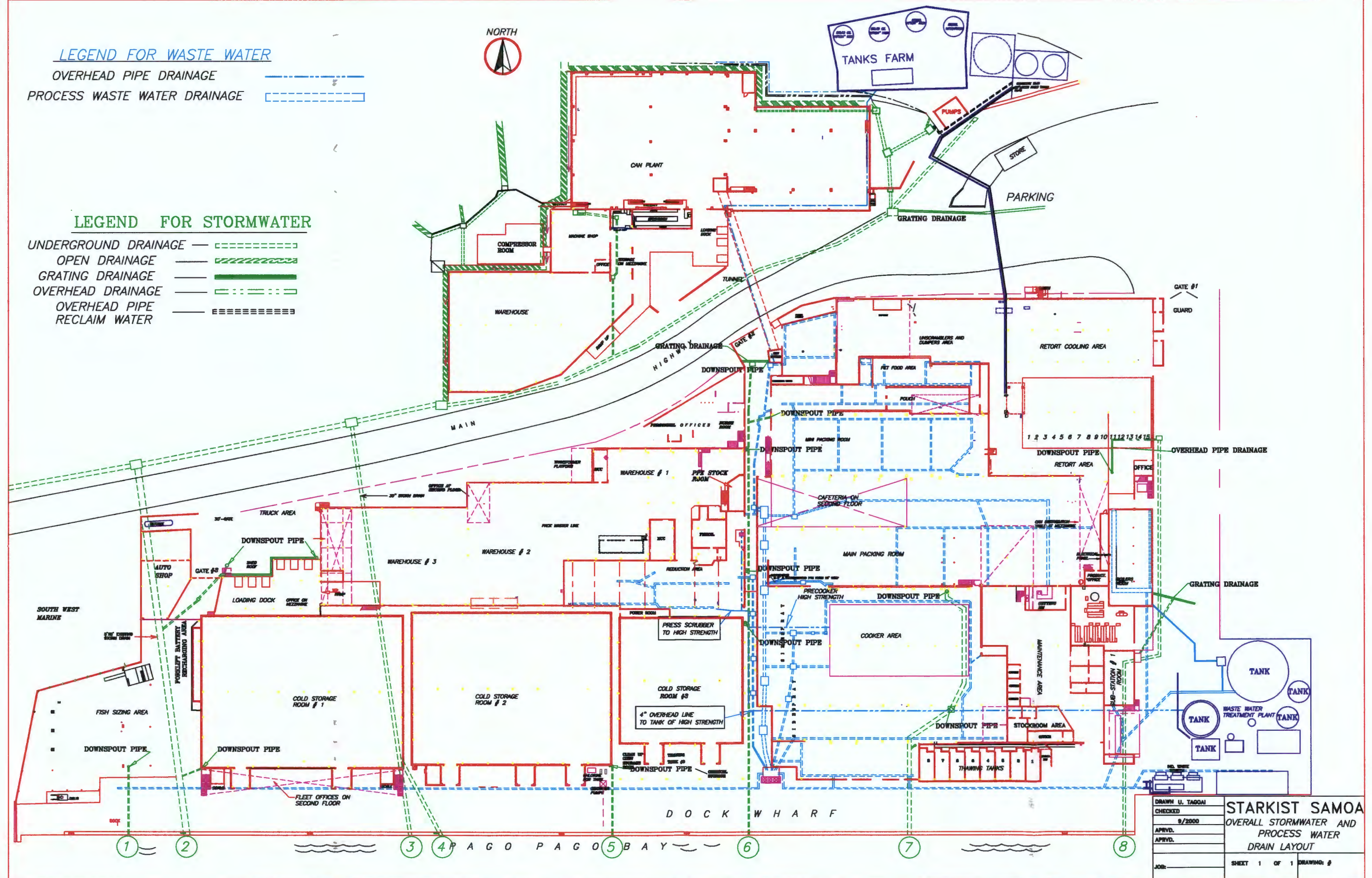


# LEGEND FOR WASTE WATER

OVERHEAD PIPE DRAINAGE ————  
PROCESS WASTE WATER DRAINAGE ————

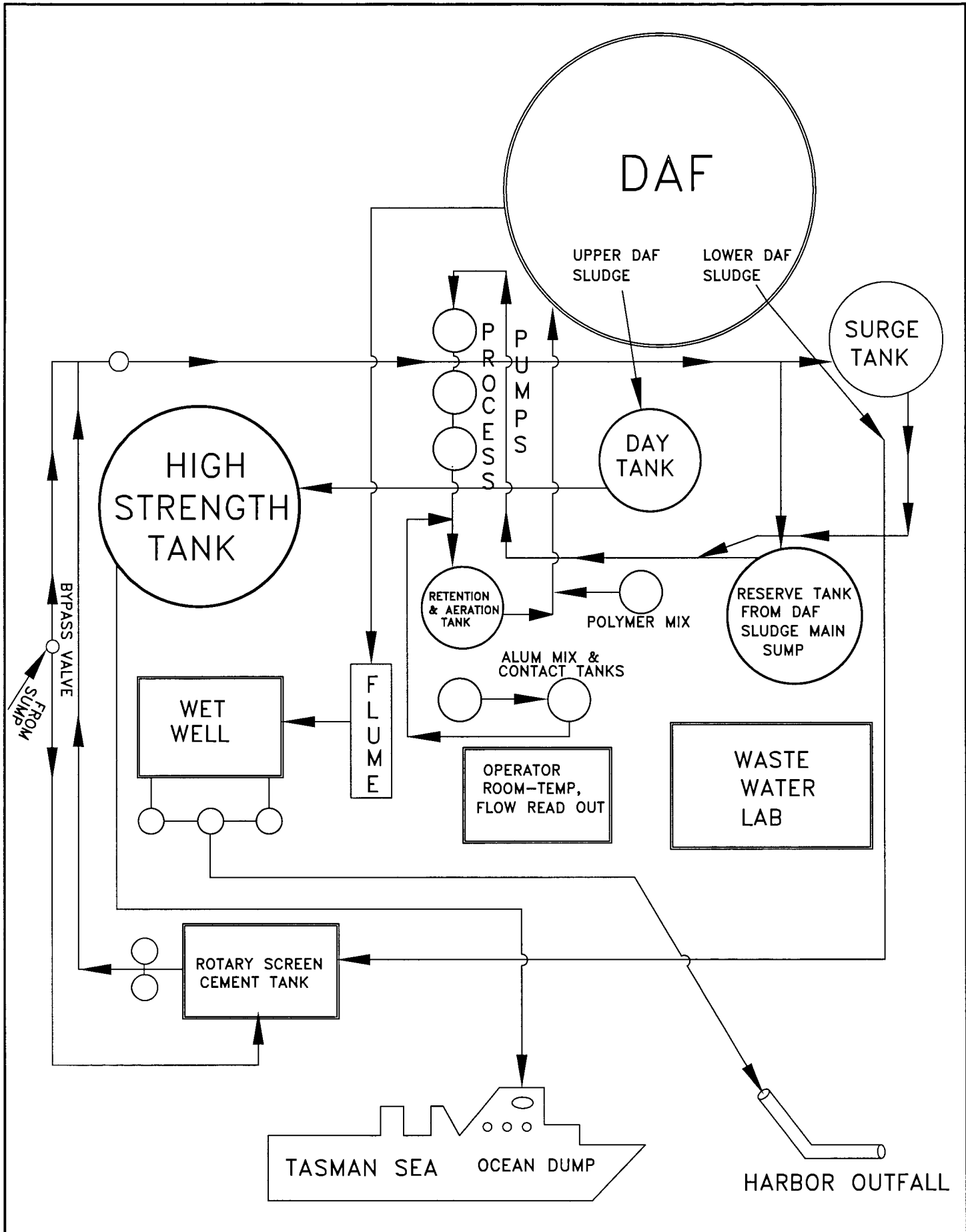
# LEGEND FOR STORMWATER

UNDERGROUND DRAINAGE ————  
OPEN DRAINAGE ————  
GRATING DRAINAGE ————  
OVERHEAD DRAINAGE ————  
OVERHEAD PIPE RECLAIM WATER ————



DRAWN: U. TAGAI		STARKIST SAMOA	
CHECKED: 9/2000		OVERALL STORMWATER AND	
APRVD.		PROCESS WATER	
APRVD.		DRAIN LAYOUT	
JOB:		SHEET 1 OF 1 DRAWING: #	

# STARKIST WASTE WATER TREATMENT & DISPOSAL PROCESS





Star-Kist Samoa, Inc.

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## APPENDIX C



## **SPCC PLAN APPENDIX ( C )**

### **( Solar Inc. Equipment )**

#### **Average /Worst Case Scenario Most Probable Discharge Response:**

- |          |                                      |  |
|----------|--------------------------------------|--|
| <b>*</b> | <b>18" Oil Boom</b>                  | <b>- Up to 1000 feet available</b>             |
| <b>*</b> | <b>Spill Boat with Operator</b>      | <b>- 22 ft. boat</b>                           |
| <b>*</b> | <b>Assist Boat with operator</b>     | <b>- 15 ft. boat</b>                           |
| <b>*</b> | <b>Diesel Driven Pumps</b>           | <b>- 2 each</b>                                |
| <b>*</b> | <b>2" Transfer Hose</b>              | <b>- 400 ft.</b>                               |
| <b>*</b> | <b>Vacuum Truck with Operator</b>    | <b>- 2000 gals. Capacity</b>                   |
| <b>*</b> | <b>Tank Truck</b>                    | <b>- 2,000 gals. Capacity</b>                  |
| <b>*</b> | <b>Flatbed Truck</b>                 | <b>- 5 tons Capacity</b>                       |
| <b>*</b> | <b>GT 260 Oil skimmer</b>            | <b>- 2 each</b>                                |
| <b>*</b> | <b>Absorbent Booms</b>               | <b>- 8" absorbent booms<br/>10' each</b>       |
| <b>*</b> | <b>Absorbent Pads</b>                | <b>- 100 pads per bail, app.<br/>500 bails</b> |
| <b>*</b> | <b>Storage Tanks</b>                 | <b>- 2 each 40,000 gals. Tanks</b>             |
| <b>*</b> | <b>Storage Tank</b>                  | <b>- 1 each 3,000 gals. Tank</b>               |
| <b>*</b> | <b>Boom Anchors</b>                  | <b>- 8 each</b>                                |
| <b>*</b> | <b>Towed Storage Bladder</b>         | <b>- 2 each – 1,400 bbls. Each</b>             |
| <b>*</b> | <b>Personal Protective Equipment</b> |  |





Star-Kist Samoa, Inc.

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## APPENDIX D



Star-Kist Samoa, Inc.

## SPCC PLAN APPENDIX ( D )

### FORM D-1

**Star-Kist Samoa, Inc.**  
**Visual Inspection Report for Tank Farm Containment Area**

#### DAILY

Date	Dike Condition	Liquid Level Containment	Security of Tank	Security of Pipe Fitting	Pump Unit	DPIC Signature

**Guidelines:**

S- Satisfactory Condition  
O- Repair or Adjustment Required  
N/A- Not Applicable  
C- See additional Comments

**\* DPIC sign on production days and security guard signs on non-production days.**

**Additional Comments:**

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Star-Kist Samoa, Inc.

## SPCC PLAN APPENDIX ( D )

FORM D-2

**Star-Kist Samoa, Inc.**  
**Water Removal Report from Dike Tank Farm Containment**

**AS REQUIRED**

Date	Sump H2O Level	Oil Present Yes/No	Time Pump Started	Time Pump stopped	Est. # Gallons Removed	Operator Signature	EPA Specialist Signature

**Additional Comments:**

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Star-Kist Samoa, Inc.

## SPCC PLAN APPENDIX ( D )

### FORM D-3

#### Star-Kist Samoa, Inc. Visual Report for Tank Farm Containment Area

#### Monthly

Date	Dike Condition	Liquid Level Containment	Security of Tanks	Security of Pipe & Fitting	Pump Unit	Fence Gate Check	Vegetation Check	EPA Specialist Signature	Utility Supervisor Signature

**Guidelines:**

S- Satisfactory

O- Repair or Adjustment Required

N/A- Not Applicable

C- See Additional Comments

**Additional Comments:**

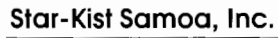
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**FORM D-4**

**AS REQUIRED**

**Additional Comments:**This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.





Star-Kist Samoa, Inc.

## SPCC PLAN APPENDIX ( D )

FORM D-6

### Star-Kist Samoa, Inc. Visual Inspection Checklist for Tank Farm Containment Area

Yearly

<b>Date:</b> _____ <b>Time:</b> _____ <b>Inspector:</b> _____	<b>Guidelines:</b> S- Satisfactory O- Repair or Adjustment Required N/A- Not Applicable C- See Additional Comments
---	--

- \_\_\_\_\_ \* Dike area check for crack.
- \_\_\_\_\_ \* Drain Valve Check for tightness and flow ability.
- \_\_\_\_\_ \* Tanks check for signs of corrosion or cracking of seams, piping condition, flange and flange gasket for tightness.
- \_\_\_\_\_ \* Pump and motor unit check for vibration and unusual noises.
- \_\_\_\_\_ \* All lighting fixtures check for operation and capability of proper illumination of area.
- \_\_\_\_\_ \* Vegetation should be cropped short in proximity of the containment area.
- \_\_\_\_\_ \* Fence and gates.

**Additional Comments:**

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Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( D )

FORM D-7

### RECORD OF INSPECTIONS BY OUTSIDE AGENCIES

DATE: \_\_\_\_\_

US COAST GUARD \_\_\_\_\_

ASEPA \_\_\_\_\_

AS PUBLIC SAFETY DEPT. \_\_\_\_\_

AS PORT AUTHORITY \_\_\_\_\_

AS FIRE DEPT. \_\_\_\_\_

INSPECTION POINTS	PASS	FAIL	OTHER
STORAGE DIKE			
DIKE			
PIPING			
FLANGES			
PUMP UNIT			
VEGETATION			
FENCED ENCLOSURE			
HOUSEKEEPING			





Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( D )

### FORM D-8

**Star-Kist Samoa, Inc.**  
**Visual Inspection Report/Checklist for Oil Delivery Monitoring**

**Date:** \_\_\_\_\_  
**INSPECTOR:** \_\_\_\_\_

**GUIDELINES:**  
**X- Satisfactory**  
**O- Repaired or Adjustment Required**  
**N/A- Not Applicable**  
**C- See Comment under Remarks/Recommendations**

**TANK FARM:**  
\_\_\_\_\_ Level of the appropriate content of the tank.

**PIPE LINE:**  
\_\_\_\_\_ No sign of corrosion damage to pipeline or support.  
\_\_\_\_\_ No leaks of valves, flanges or fittings.  
\_\_\_\_\_ Signs/barriers to protect pipeline from vehicles in place.

**TRUCK LOADING/UNLOADING AREA:**  
\_\_\_\_\_ No water in the containment area.  
\_\_\_\_\_ Tank truck has no leak.  
\_\_\_\_\_ Warning signs were posted.  
\_\_\_\_\_ Tank discharge pipe is inside the containment area.  
\_\_\_\_\_ Hoses are in good condition: No leaks.  
\_\_\_\_\_ Quick connection coupling are seated firmly.  
\_\_\_\_\_ Pump is in good working condition: no clogged.  
\_\_\_\_\_ Control valve is open.

**END OF UNLOADING OPERATION:**  
\_\_\_\_\_ Control valve is closed.  
\_\_\_\_\_ Pump is turned to the "off" position.  
\_\_\_\_\_ Hoses are purged, capped and tank has no leaks.  
\_\_\_\_\_ Clean the area.



Star-Kist Samoa, Inc.

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**REMARKS/RECOMMENDATION:**

\_\_\_\_\_  
**Boiler Operator (Diesel Oil)**

\_\_\_\_\_  
**Sanitation Operator (Vegetable Oil)**

\_\_\_\_\_  
**Date**



Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( D )

FORM D-9

Star-Kist Samoa, Inc.  
Visual Inspection for Oil Container  
Exterior Area

Weekly

DATE: \_\_\_\_\_  
INSPECTOR: \_\_\_\_\_

**GUIDELINES:**

**S- Satisfactory**

**O- Repairs Required**

**C- See additional Comments under Remarks/Recommendation**

**N/A- Not Applicable**

**DIESEL TANK #1 (Tank farm)**

- \_\_\_\_\_ Deteriorated, rusty (Foundation/Wall)
- \_\_\_\_\_ Leakage on the foundation
- \_\_\_\_\_ Oil seepage on the tank wall
- \_\_\_\_\_ Oil discharge on the containment/or ground surrounding the tank

**DIESEL TANK #2 (Tank Farm)**

- \_\_\_\_\_ Deteriorated, rusty (Foundation/Wall)
- \_\_\_\_\_ Leakage on the foundation
- \_\_\_\_\_ Oil seepage on the tank wall
- \_\_\_\_\_ Oil discharge on the containment/ or ground surrounding the tank



**Vegetable Tank #3 (Tank Farm)**

- ☐ Deteriorated, rusty (foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**VEGETABLE TANK #4 (Tank farm)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**OIL/WATER SEPARATOR TANK (Waste Water Treatment Area)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**EMERGENCY GENERATOR UNIT (Boiler Area)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**(2) EMERGENCY GENERATOR FUEL TANKS (Compressor Area)**

- ☐ Deteriorated, rusty (foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**EMERGENCY DIESEL FUEL TANK (Fire Pump House)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank



**TRANSFORMER (Compressor area)**

- ☐ Deteriorated, rusty (foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**TRANSFORMER (Satala Freezer)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**POLE MOUNT TRANSFORMER (Logistic, roadside)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**POLE MOUNT TRANSFORMER (Fleet, roadside)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**HYDRAULIC RESERVOIR (Fish Room)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank

**HYDRAULIC RESERVOIR (Retort)**

- ☐ Deteriorated, rusty (Foundation/Wall)
- ☐ Leakage on the foundation
- ☐ Oil seepage on the tank wall
- ☐ Oil discharge on the containment/or ground surrounding the tank



Star-Kist Samoa, Inc.

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**REMARKS/RECOMMENDATIONS:**

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**Note:**

Work order will be file with the inspection sheet.



Star-Kist Samoa, Inc.

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## **APPENDIX E**



Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( E )

### RECORD OF NOTIFICATION AND INSPECTIONS

**1. UNITES STATE COAST GUARD**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_

**Comments:**

**2. AMERICAN SAMOA ENVIRONMENTAL PROTECTION AGENCY**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_

**Comments:**

**3. AMERICAN SAMOA POWER AUTHORITY**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_

**Comments:**

**4. AMERICAN SAMOA FIRE DEPARTMENT**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_

**Comments:**





Star-Kist Samoa, Inc.

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**5. AMERICAN SAMOA PUBLIC SAFETY DEPARTMENT (POLICE)**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_

**Comments:**

**6. NATIONAL RESPONSE CENTER**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_

**Comments:**

**7. UNITED STATE ENVIRONMENTAL PROTECTION AGENCY**

**Name :** \_\_\_\_\_

**Date :** \_\_\_\_\_

**Time :** \_\_\_\_\_



Star-Kist Samoa, Inc.

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## **APPENDIX F**



Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( F )

### NOTIFICATION TELEPHONE NUMBERS

### EXTERNAL

TEMCO	(684) 699-6482
US COAST GUARD	(684) 633-2299
US COAST GUARD MSD CELLULAR	258-7001, 258-7002, 258-7003
US COAST GUARD MSD FACSIMILE	(684) 633-1933
US COAST GUARD MSO HONOLULU FAX PORT OPS	(808) 541-2068
US COAST GUARD MSO HONOLULU INSP.	(808) 541-3154
ENVIRONMENTAL PROTECTION AGENCY	(684) 633-2304/ 633-5801
FIRE DEPARTMENT	911
POLICE DEPARTMENT	911
AMBULANCE	911
SOLAR INC. OFFICE	(684) 699-8706
SOLAR INC. FAX.	(684) 699-8706
SOLAR INC. CELLULAR	(684) 733-1317
NATIONAL RESPONSE CENTER	800-424-8802
PUBLIC SAFETY	(684) 633-1111

### NOTIFICATION TELEPHONE NUMBERS

### INTERNAL

Phil Thirkell/General Manager	BUSINESS	(684) 644-4231 ext. 311/327
ON-SCENE-COMMANDER	HOME	644-1324
	CELLULAR	258-4211
Lance Ihaka/Manager Engineering	BUSINESS	(684) 644-4249 ext. 362
EMERGENCY RESPONSE COORDINATOR	HOME	644-1238
	CELLULAR	258-3234
Sonny Thompson/ Manager Safety & Health	BUSINESS	(684) 644-1343 ext. 425
SAFETY AND HEALTH TEAM LEADER	HOME	644-1343
	CELLULAR	258-2384
Joe Carney/ Dept. Head Utility	BUSINESS	(684) 644-2860 ext. 354
CRITICAL OPERATIONS TEAM LEADER	HOME	644-2332
	CELLULAR	258-6964



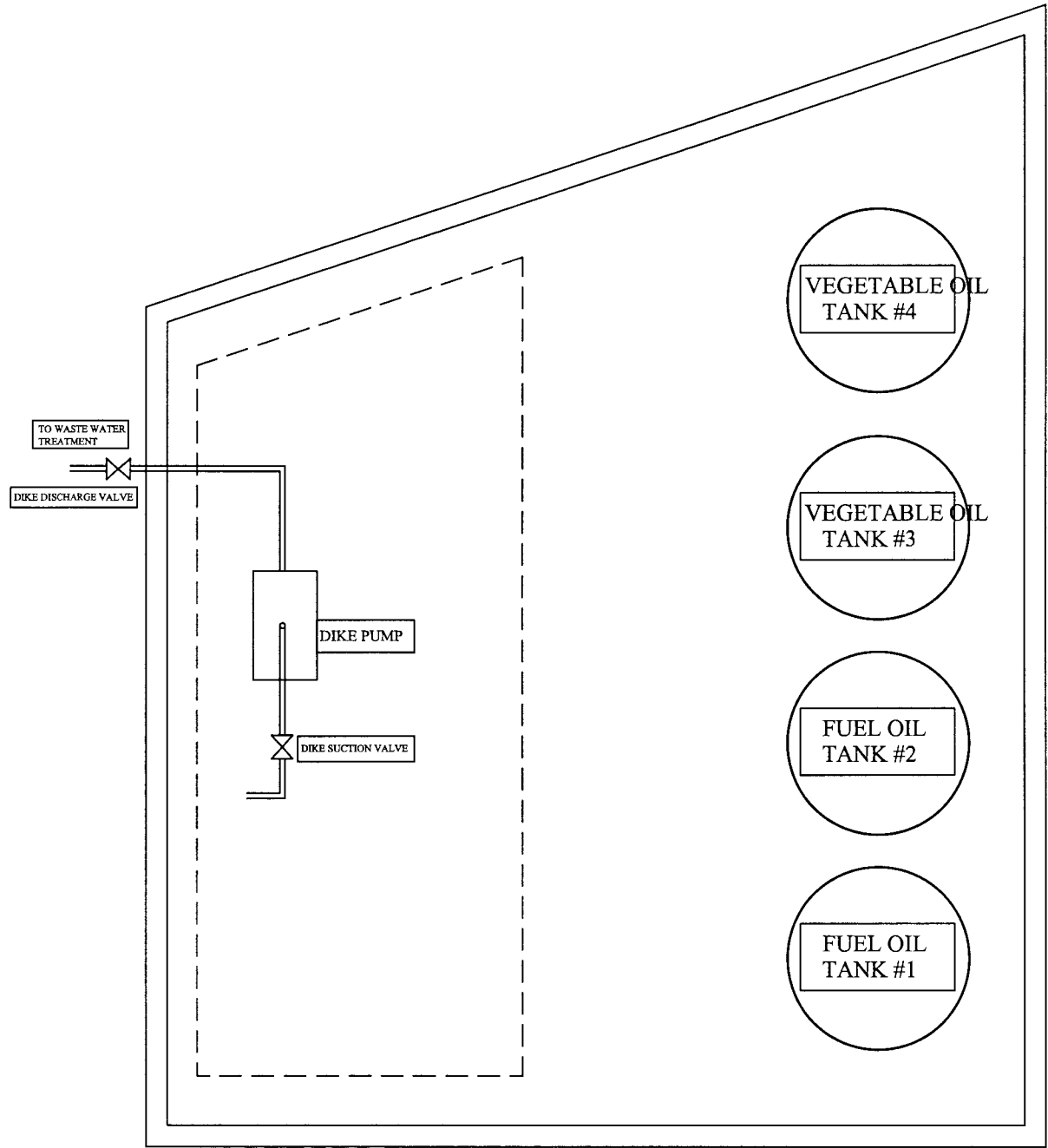
Star-Kist Samoa, Inc.

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## APPENDIX G

SPCC PLAN APPENDIX [G]

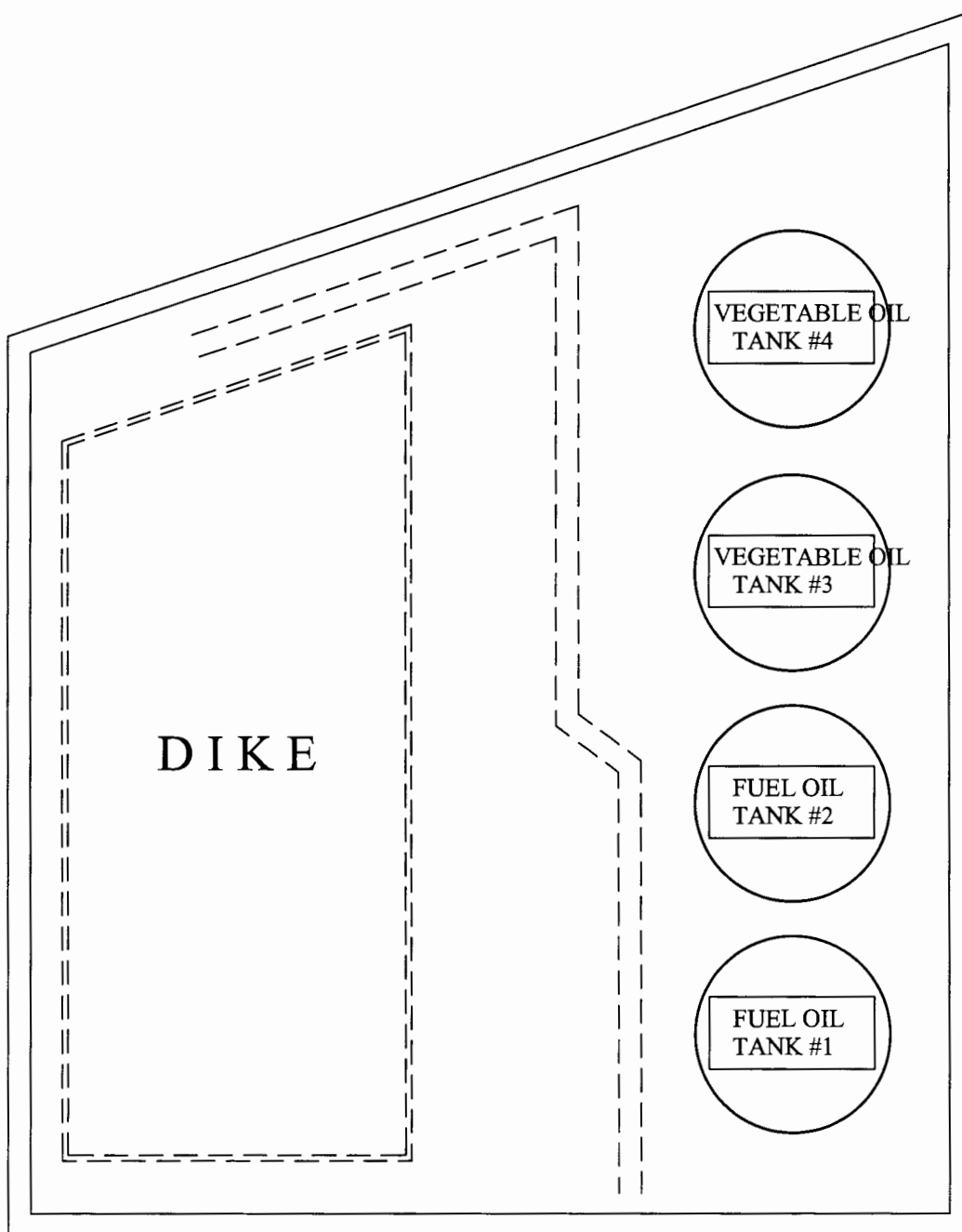
G - 1



DIKE STORAGE AREA

## SPCC PLAN APPENDIX [G]

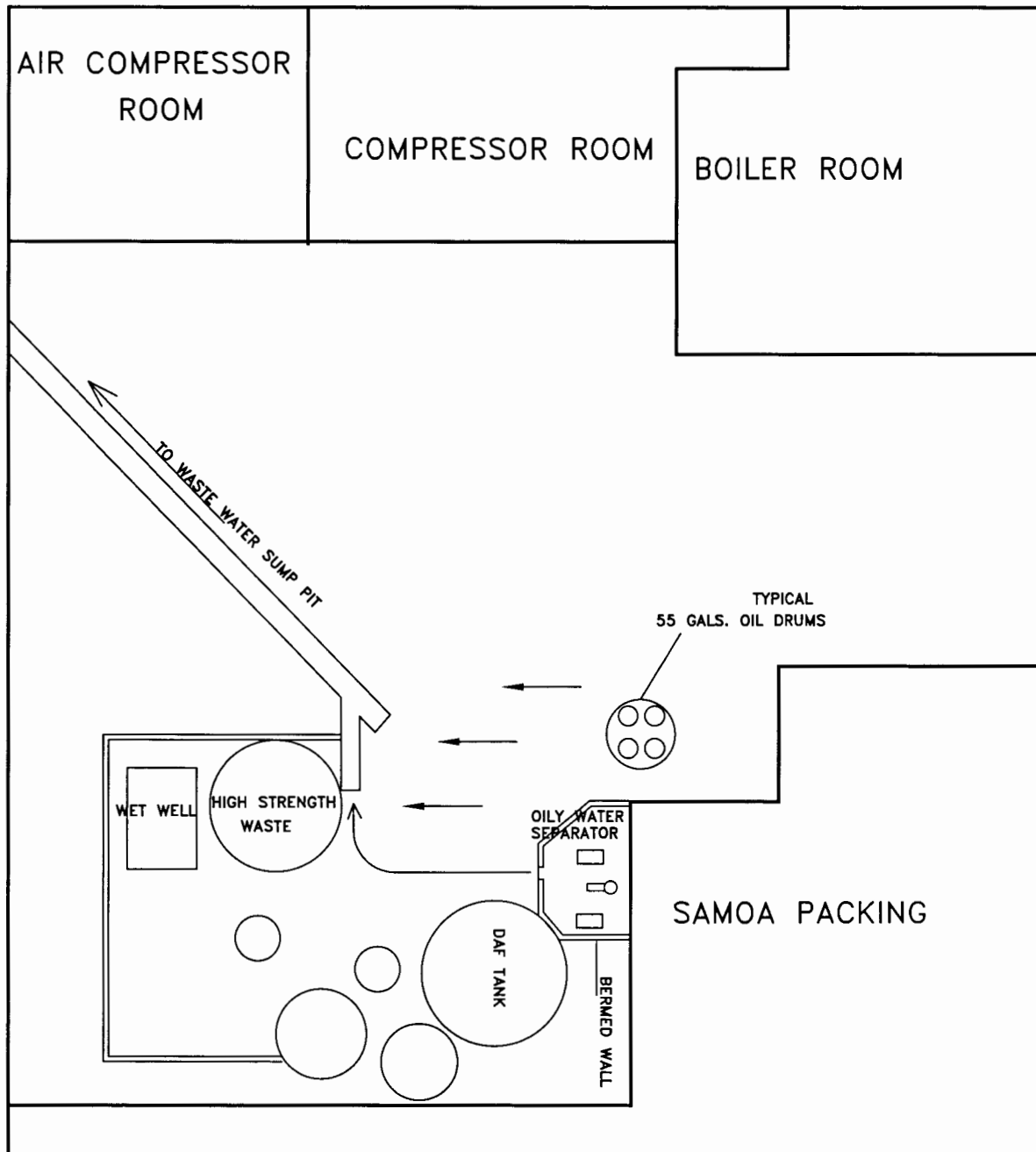
G - 2



## DIKE STORAGE AREA

## SPCC PLAN APPENDIX [G]

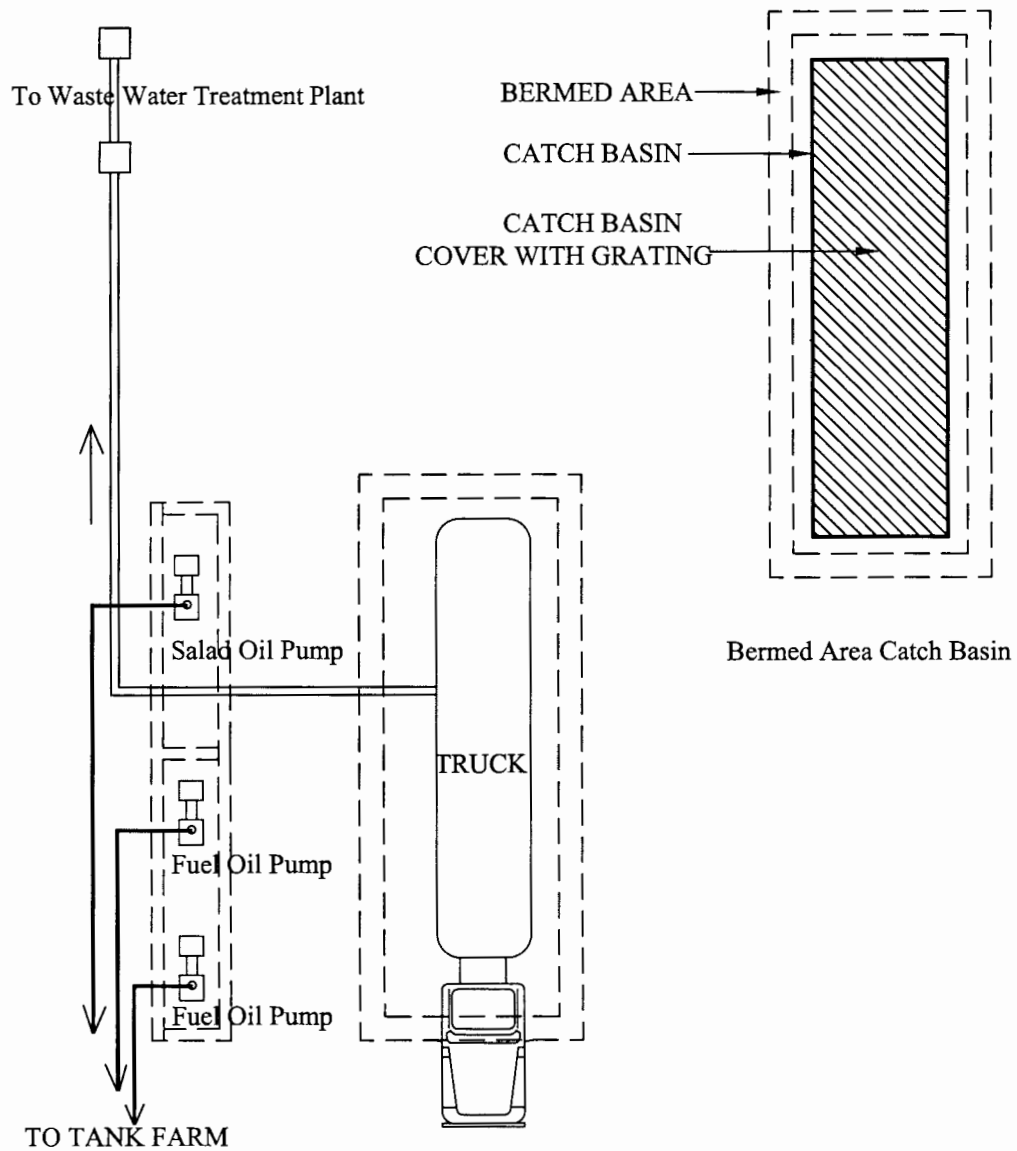
G - 3



## OILY WATER SEPARATOR

## SPCC PLAN APPENDIX [G]

G - 4



## VEGETABLE OIL & FUEL OIL UNLOADING AREA





Star-Kist Samoa, Inc.

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## **APPENDIX H**



Star-Kist Samoa, Inc.

## SPCC PLAN APPENDIX ( H )

FORM IIR-IA

REFERENCE NO. \_\_\_\_

### INCIDENT INVESTIGATION-SPCC PLAN INCIDENT SUMMARY

Facility Information:

Date of Incident: / /

Name: Star-Kist Samoa, Inc.	SIC Code:
Address: Pago Pago, American Samoa 96799	

Incident Type (Check any that apply)

<input type="checkbox"/> Near- Miss <input type="checkbox"/> Leaking Tank/Fitting/Pipe	<input type="checkbox"/> Pump Malfunction <input type="checkbox"/> Fire/Explosion	<input type="checkbox"/> Dike Crack/Failure <input type="checkbox"/> Other
---	--	---

Primary source of Release (Check One)

<input type="checkbox"/> Rupture Hose <input type="checkbox"/> Rupture Tank <input type="checkbox"/> Evaporator	<input type="checkbox"/> Dike Crack/Malfunction <input type="checkbox"/> Piping Failure <input type="checkbox"/> Valve Malfunction	<input type="checkbox"/> Operator <input type="checkbox"/> Tank Overflow <input type="checkbox"/> Others
---	--	--

Cause(s) Contributing to Release (Check any that apply)

<input type="checkbox"/> Human factor <input type="checkbox"/> Design Shortcoming <input type="checkbox"/> Misapplied Equipment <input type="checkbox"/> Power Failure <input type="checkbox"/> Corrosion <input type="checkbox"/> Inadequate Maintenance <input type="checkbox"/> Earthquake	<input type="checkbox"/> Equipment Defect/Malfunction <input type="checkbox"/> Improper Installation <input type="checkbox"/> Mechanical Damage <input type="checkbox"/> Hydrostatic Expansion <input type="checkbox"/> Hydraulic Shock <input type="checkbox"/> Inadequate Administrative Controls	<input type="checkbox"/> Control Failure <input type="checkbox"/> Process Upset <input type="checkbox"/> Other Emergency <input type="checkbox"/> System Change <input type="checkbox"/> Maintenance Activity <input type="checkbox"/> Inadequate Labeling
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Star-Kist Samoa, Inc.

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Type of Change Recommendation to Prevent Recurrence (Check any that apply)

<b><u>ADMINISTRATION</u></b>	<b><u>ENGINEERING</u></b>
<input type="checkbox"/> Operating procedures	<input type="checkbox"/> Design
<input type="checkbox"/> Additional Training	<input type="checkbox"/> Equipment
<input type="checkbox"/> Emergency Response Procedure	<input type="checkbox"/> Piping
<input type="checkbox"/> Safe Work Practice	<input type="checkbox"/> Safety Equipment
<input type="checkbox"/> Labeling/Identification	<input type="checkbox"/> Maintenance Activity
<input type="checkbox"/> Maintenance Procedure	<input type="checkbox"/> Control
<input type="checkbox"/> Management of Changes Procedures	

Result of Incident (Provide Request Information)

Total Quantity Release:
Estimate of property/Product Damages:
Number of Serious Injuries:
Number of Fatalities:



Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( H )

FORM IIR-IB

REFERENCE NO. \_\_\_\_

### INCIDENT INVESTIGATION SPCC-PLAN INCIDENT DESCRIPTION

LOCATION : \_\_\_\_\_  
DATE : \_\_\_\_\_  
TIME : \_\_\_\_\_  
DURATION OF INCIDENT: \_\_\_\_\_

#### CIRCUMSTANCES LEADING UP TO INCIDENT:

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#### EVENTS AND ACTIONS AS INCIDENT UNFOLDED:

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Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( H )

FORM IIR-IC

REFERENCE NO. \_\_\_\_

### INCIDENT INVESTIGATION SPCC-PLAN INCIDENT CAUSE

<b>INVESTIGATION TEAM'S ASSESSMENT OF ROOT CAUSE OF INCIDENT:</b>
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**INVESTIGATION TEAM'S ASSESSMENT OF ADDITIONAL CONTRIBUTING  
CAUSE:**

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**ACTIONS OR CIRCUMSTANCES WHICH EITHER HELPED TO MINIMIZE THE  
EFFECT OF THE INCIDENT OR WHICH COULD HAVE MINIMIZE THE EFFECT:**

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Star-Kist Samoa, Inc.

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## SPCC PLAN APPENDIX ( H )

FROM IIR-ID

REFERENCE NO. \_\_\_\_

### INCIDENT INVESTIGATION SPCC-PLAN APPROVAL, FOLLOW UP REVIEWS

Date and Time Team Commenced Investigation: \_\_\_\_\_

Team Membership ( List Team Leader First )

NAME	TITLE	COMPANY	APPROVAL

Location of Team's Working and Support Document:

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Recommended Changes:

MCF Ref. No.	Description of Changes

Recommended Employee Reviews Report:

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Star-Kist Samoa, Inc.

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Submitted By: \_\_\_\_\_

Name

\_\_\_\_\_

Date

\_\_\_\_\_

Signature

\_\_\_\_\_

Title

Received By: \_\_\_\_\_

Name

\_\_\_\_\_

Date

\_\_\_\_\_

Signature

\_\_\_\_\_

Title



Star-Kist Samoa, Inc.

## SPCC PLAN APPENDIX ( H )

FROM IIR-2A

REFERENCE NO. \_\_\_\_\_

### INCIDENT INVESTIGATION SPCC-PLAN CLOSE-OUT

Description of Incident:

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Investigation Review Sessions:

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Hazard Reduction Actions:

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Copy Distribution:  
DOC. File ID:

Submitted By: \_\_\_\_\_

Name

\_\_\_\_\_ Date

\_\_\_\_\_ Signature

\_\_\_\_\_ Title

Received By: \_\_\_\_\_

Name

\_\_\_\_\_ Date

\_\_\_\_\_ Signature

\_\_\_\_\_ Title





Star-Kist Samoa, Inc.

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## **SPCC PLAN APPENDIX ( H )**

### **FORM IIR-LOG**

#### **INCIDENT INVESTIGATION SPCC-PLAN REFERENCE NO. LOG**

<b>DATE</b>	<b>REF.NO</b>	<b>INCIDENT DESCRIPTION</b>



Star-Kist Samoa, Inc.

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## **APPENDIX I**



## SPCC PLAN APPENDIX ( I-1 )

### **Star-Kist Samoa, Inc. Mechanical Integrity Program for Oil Storage System (Components)**

**There are four (4) tanks in total and are located on the hillside across the road from the plant. These tanks are identified in Appendix G noted as Dike Storage Area.**

These tanks will be inspected every five (5) years both internally and externally. The purpose of this inspection is to ensure continuity of operation and prevent unexpected release of oil to the environment.

It is requires under 40 CFR §112.8(d)(1) that all buried piping that is installed or replaced on or after August 16, 2002 must have protective wrapping and coating and cathodic protection.

#### **THE FOLLOWING WILL BE CHECKED:**

- \* All flanges checked for evidence of leaks/drips, missing bolts or nuts and proper fittings.
- \* All valves to be checked for freedom of movement and signs of leakage. Evidence of leakage such as drips, stains etc. will be investigated thoroughly and will necessitate removal and dismantling the valve.
- \* Tanks will be emptied and thickness test (Ultrasonic Test) will be taken at quadrants around the tanks. These reading will be documented and compared to original specs. Reading that shows erosion of metal exceeding --% of original specs will necessitate removal of the tank from service immediately carried out to bring the tank back to original specs. Documentation of the inspection is located in Appendix 1-5, named Mechanical Integrity Program for Oil Storage (Components) Tanks Inspection Record.
- \* Piping to and from tanks to be hydrostatic tested every five (5) years. This piping is graphically represented in drawings labeled: **STAR-KIST SAMOA PLANT LAYOUT (Figure 1) and the two (2) pump units illustrated in Appendix G.** Documentation of the inspection is located in Appendix 1-4, named Mechanical Integrity program for Oil Storage system (Components) Pipe/Valve/Fitting Inspection Record.



- \* Hoses are used to deliver oil from the tanker to pumping unit for final destination at the farm across from the plant. These hoses will be checked once per year for cracks, tears, gouges, and blisters in the cover. If any of the conditions above are noted the hose be taken out of service and replaced with a new one of proper type. Documentation of hose inspection is located in Appendix 1-6 named "Mechanical Integrity program for Oil Storage System (Components) Hose Inspection Record.
- \* Work Orders are to be generated for all work carried out relating to failure of any item inspected by the operator and will be file in the Engineering Department by EPA Specialist.



## SPCC PLAN APPENDIX (1-2 )

### **Star-Kist Samoa, Inc. Mechanical Integrity Program for Oil Storage System (Components)**

#### **Purpose:**

To prevent unexpected releases of fuel/process oil to the environment from the unloading/ loading / distribution / storage components of Star-Kist Samoa, Inc.

#### **Scope:**

This applies to the erection, installation, repair, replacement and maintenance of the components below:

- Tank
- Pumps
- Valves
- Pipes
- Fittings
- Hoses

#### **Inspection program Components:**

- \* **Inventory**  
Total number of items to be inspected. Where applicable these items will be grouped by type i.e.: tanks will be group into one category but identified individually. Likewise valves, pumps etc.
- \* **Pass/Fail Criteria**  
Identifies each critical component that must be examined and describes what is considered out of limits. Refer to Appendix 1-6 title, “ Mechanical Integrity Program for Oil Storage System (Components) Hose Inspection Record”.
- \* **Frequency**  
Tells how often a component must be inspected.
- \* **Inspect Finding**



Star-Kist Samoa, Inc.

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Identifies pump unit that failed and explains what caused the failure. Refer to Appendix 1-7 title, "Mechanical Integrity Program for Oil Storage System (Components) Pump Units Inspection Record.

## **SPCC PLAN APPENDIX ( 1-3 )**

### **Star-Kist Samoa, Inc. Mechanical Integrity Program for Oil Storage System (Components)**

#### **Dike Area Monthly**

<b>DATE</b>	<b>DIKE WALL INTACT &amp; NO SEEPAGE</b>	<b>IMMERSIBLE PUMP</b>	<b>PLASTIC LINING INTACT</b>	<b>INSPECTOR SIGNATURE</b>
<b>RECOMMENDATION</b>				

Note:



Star-Kist Samoa, Inc.

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Work order to be developed covering all repairs associated with failure of any items will be file in the engineering office by EPA Specialist.

## SPCC PLAN APPENDIX (1-4)

### Star-Kist Samoa, Inc. Mechanical Integrity Program for Oil Storage System (Components)

#### Pipe/Valve/Fitting Inspection Records

The following report is in compliance to 40 CFR §112.8(c)(6) requirements. The procedure and results have determined the system has proven efficient to meet all standards as required for operation

#### HYDROSTATIC TEST OF SALAD OIL/DIESEL OIL COMPONENTS

<u>DATE</u>	COMPONENTS	AREA	METHODS	TIME	
				FROM	TO
	Vegetable oil pipe from pump to tank	Plant	Hydro @ 35psi		
	Vegetable oil pipe from tank to plant	Tank Farm	Hydro @ 35psi		
	Diesel oil pipe from pump to tank	Plant	Hydro @ 35psi		
	Diesel oil pipe from tank to plant	Tank Farm	Hydro @ 35psi		
	Vegetable Hose	Plant	Hydro @ 35psi		
	Diesel Hose	Plant	Hydro @ 35psi		

Test Performed By : \_\_\_\_\_

: \_\_\_\_\_



Star-Kist Samoa, Inc.

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Approved By : \_\_\_\_\_

Reported By : \_\_\_\_\_

## SPCC PLAN APPENDIX (1-5)

### Star-Kist Samoa, Inc. Mechanical Integrity Program for Oil Storage System (Components)

#### Tanks Inspection Records

The following report is in compliance to 40 CFR §112.8(c)(6) requirements. The procedure and results have determined the system has proven efficient to meet all standard as required for operation.

#### Ultrasonic Test of Vegetable Oil/Diesel Oil Tanks

<u>DATE</u>	COMPONENTS	POINTS OF TESTING	AREA	METHODS	THICKNESS
	Diesel Oil tank #1	Foundation	Tank Farm		
		Middle			
		Top			
	Diesel Oil Tank #2	Foundation	Tank Farm		
		Middle			
		Top			
	Vegetable Oil Tank #3	Foundation	Tank Farm		
		Middle			
		Top			
	Vegetable Oil Tank #4	Foundation	Tank Farm		
		Middle			
		Top			

Test Performed : \_\_\_\_\_

Approved By : \_\_\_\_\_





Star-Kist Samoa, Inc.

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Reported By : \_\_\_\_\_

## SPCC PLAN APPENDIX (1-6)

### Star-Kist Samoa, Inc. Mechanical Integrity Program for Oil Storage System (Components)

#### Hose Inspection Record Transfer Hose for Fuel Oil

Once a Year

Date : \_\_\_\_/\_\_\_\_/\_\_\_\_

#### Hose Inspected for:

<b>Blister</b>	<b>Crack</b>	<b>Cuts</b>	<b>Tears</b>	<b>Gouges</b>
Pass/Fail	Pass/Fail	Pass/Fail	Pass/Fail	Pass/Fail
____/____	____/____	____/____	____/____	____/____

#### Hose Inspection Record

#### Transfer Hose for Vegetable Oil

Date : \_\_\_\_/\_\_\_\_/\_\_\_\_

#### Hose Inspected for:

<b>Blister</b>	<b>Crack</b>	<b>Cuts</b>	<b>Tears</b>	<b>Gouges</b>
Pass/Fail	Pass/Fail	Pass/Fail	Pass/Fail	Pass/Fail
____/____	____/____	____/____	____/____	____/____



Star-Kist Samoa, Inc.

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**Note:**

Hoses that fail in any of the above will be necessitate replacement.

## **SPCC PLAN APPENDIX (1-7)**

**Star-Kist Samoa, Inc.**

**Mechanical Integrity Program for Oil Storage System (Components)**

### **Pump Units Inspection Record**

There are two (2) pump units associated with the fuel oil storage system and one (1) pump unit associated with vegetable storage system. These pump units are identified in Appendix G in the drawing for Dike Storage Area, Vegetable Oil and Fuel Oil Unloading Area.

These pump units will be dismantled and checked internally every five (5) years. All worn out parts will be replaced. All worn out connection fittings and hoses will be replaced and replacement(s) will be documented.

#### **Pump Unit Inspection Record:**

<b>DATE</b>	<b>TYPE OF PUMP</b>	<b>FINDINGS</b>	<b>PASS/FAIL</b>	<b>SIGNATURE</b>
	<b>Fuel Oil Pump #1</b>			
	<b>Fuel Oil Pump #2</b>			
	<b>Vegetable Oil Pump</b>			

**Note:**

Work order will be developed covering all repairs associated with failure of any item. EPA Specialist will file a copy of the work order.